



### **BPPL Holdings PLC – Policy on Whistleblowing**

#### **1. Purpose**

BPPL Holdings PLC is committed to developing a culture of corporate compliance, ethical behavior and good corporate governance.

The purpose of this Whistleblowing Policy is to provide a safe and confidential process for employees, contractors, and other stakeholders to report any concerns regarding unethical behavior, legal violations, or misconduct within BPPL Holdings PLC or its subsidiaries and affiliates. ("Company").

This policy aims to encourage the reporting of such concerns without fear of retaliation.

#### **2. Scope**

This policy applies to all employees, contractors, and any other individuals associated with BPPL Holdings PLC, its subsidiaries and affiliates. It covers concerns related to illegal or unethical conduct, including but not limited to

- Fraud or financial mismanagement
- Corruption or bribery
- Violation of laws or regulations
- Unsafe working conditions
- Harassment or discrimination
- Misuse of Company resources

#### **3. Policy Statement**

BPPL Holdings PLC is committed to maintaining the highest ethical standards and compliance with all applicable laws and regulations. The Company will not tolerate any retaliation against individuals who report concerns in good faith or participate in investigations.

#### **4. Reporting Mechanism**

Concerns can be reported through the following channels:

- Internal Reporting: Employees can report concerns to their direct supervisor, manager, or Plant Heads in the first instance. However, if they believe that it will not address their concerns adequately, they can directly access the Whistleblowing Officer.



- Whistleblowing Officer: The Company has appointed a Whistleblowing Officer who can be contacted directly. This individual is responsible for receiving and investigating whistleblowing reports.

### **5. Investigation Process**

Upon receipt of a report, the Whistleblowing Officer will acknowledge receipt of the concern within 2 business days and carry out an assessment to determine the appropriate action.

Thereafter the Whistleblowing officer will conduct a thorough and impartial investigation, if warranted, and will keep the whistleblower informed of the progress and outcome of the investigation, within reasonable limits.

The Company will take all reasonable steps to ensure that the identity of the whistleblower is kept confidential, except where disclosure is required by law or is necessary to conduct a thorough investigation. All reports will be handled with the utmost discretion.

### **6. Protection against Retaliation**

BPPL Holdings PLC prohibits retaliation against individuals who report concerns in good faith or participate in investigations. Retaliation includes any adverse action taken against a whistleblower, such as demotion, dismissal, or harassment. Anyone found to be retaliating against a whistleblower will face disciplinary action, up to and including termination of employment.

### **7. False or Malicious Reporting**

Whilst, the Company encourages the reporting of genuine concerns, individuals found to have made false or malicious reports will be subject to disciplinary action. It is important that reports are made based on reasonable belief and not for personal gain or harassment.

This policy does not cover personal work-related Grievances, which have to be dealt with in line with relevant internal HR policies.

### **8. Accessibility to the Policy**

This Policy will be available in the company intranet (internal network).