

CAST COMMERCIAL ACUMEN LIMITED

Whistleblowing Policy

1. Introduction

Team members may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, team members are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows team members to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

Cast Commercial Acumen Limited ("the Company") is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all team members are required to bring up to their manager or other designated person any issue that, in the team member's opinion, might constitute bribery or corruption.

2. Specific Subject Matter

If, in the course of employment, contract or engagement, a team member becomes aware of information which they reasonably believe tends to show one or more of the following:

- 2.1 That a criminal offence has been committed, is being committed or is likely to be committed.
- 2.2 That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- 2.3 That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- 2.4 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 2.5 That the environment, has been, is being, or is likely to be, damaged.
- 2.6 That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- 2.7 That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.
- 2.8 That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

they must use the Company's disclosure procedure as set out below.


3. Disclosure Procedure

- 3.1 Information which a team member reasonably believes tends to show one or more of the above should promptly be disclosed to Managing Director so that any appropriate action can be taken.
- 3.2 Team members will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.

- 3.3 However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'
- 3.4 For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, team members should speak in confidence to Managing Director.

1. Policy Review and Implementation

- 1.1 The Company shall review this Policy not less than two years and otherwise as required in order to ensure that it remains up-to-date and fit for purpose.
- 1.2 This Policy will be updated as necessary to reflect current best practice, official guidance, and in line with current legislation.

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Signature:	

This Whistleblowing Policy is not contractual and may be varied by Cast Commercial Acumen Limited at any time.