

GROUP POLICY

Whistleblowing



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1 Purpose

At Diploma PLC ("Diploma"), we are committed to conducting business with honesty and integrity, fostering an inclusive environment where individuals feel empowered and secure in speaking up. Like all organisations, we recognise the inherent risk of encountering wrongdoing or inadvertently tolerating misconduct. Examples of wrongdoing encompass a broad spectrum, including financial malpractice such as bribery and corruption, breaches of company policies and procedures, deviations from statutory requirements for sound business management, and efforts to conceal such activities.

It is the responsibility of every employee to identify and address such situations appropriately. By nurturing a culture of openness, we encourage you to raise any concerns you may have in the workplace. We understand that you may fear potential repercussions, such as victimisation or jeopardising your job security, by reporting such issues. However, we want to reassure you that all colleagues are afforded statutory protection when raising concerns through the proper channels.

Our policy is designed to provide you with the opportunity and protection to voice your concerns. Whether you are acting in good faith or even if you happen to be mistaken, your commitment to transparency is valued and protected. If there is anything you believe Diploma should be aware of, please use the procedure outlined in this policy. Early detection of malpractice enables Diploma to take timely measures to safeguard the interests of the group and its colleagues. We encourage you to "blow the whistle" on any wrongdoing or irregularities without hesitation.

2 Scope

This policy extends to the entirety of the Diploma group ("Group"), encompassing all directors, officers, and employees of Diploma and its subsidiaries, regardless of the country in which business is conducted or situated. Anyone with concerns or information regarding misconduct that poses a potential or actual breach of this policy is encouraged to raise such concerns under its provisions. This includes, but is not limited to, current and former employees, contractors, suppliers, service providers, trainees, members of the communities in which we operate, as well as their partners, dependents, and relatives.

Diploma is committed to respecting and adhering to all relevant local laws. In instances where local laws impose stricter or more specific requirements, including provisions for reporting party rights and protections, the handling of concerns, conducting investigations, and other obligations applicable to any Diploma business, management is responsible for implementing a country-based policy through a local addendum to this policy. The [Group General Counsel](#) should be informed of such circumstances accordingly.

3 Policy Statement

The Diploma Board of Directors is committed to this policy. If you use this policy to raise a concern in good faith, Diploma gives you its assurance that you will not suffer any form of retribution, victimisation or detriment. If you show that you have been subjected to retribution, victimisation or detriment because of using this policy, disciplinary action will be taken against the perpetrator(s).

Diploma will treat your concerns seriously and act according to this policy. You will not be asked to prove anything. If you ask for a matter to be treated in confidence, we will respect your request and only make disclosures with your consent. You will normally be given feedback on any investigation and we will be sensitive to any concerns you may have because of any steps taken under this procedure.

4 How to raise your concern internally

4.1 Tell someone you trust

For queries about or suspected breaches of our policy, tell someone you trust by speaking to:

- your line manager, Managing Director/ President;
- [Group General Counsel](#); or
- Group Chief Executive Officer ([CEO](#)) or Chief Financial Officer ([CFO](#)).

If you feel your concerns cannot be addressed having considered someone you trust above, then please use our [Confidential Hotline](#) below.

4.2 Confidential hotline

The Diploma Confidential Hotline is managed by Safecall. Safecall is a respected, confidential and independent third-party organisation. Safecall provides a 24-hours a day, 7 days a week service and can be contacted in the following manner:

- Freephone (full list Freephone numbers available on their [website](#))
- Raising a report on their website (<https://www.safecall.co.uk/file-a-report/>)
- Email (diploma@safecall.co.uk)

When contacting Safecall via telephone, you will be put through to an operator who is trained to receive your report about concerns in the workplace that you feel cannot be addressed in any other way (having considered telling someone you trust listed above). Your call will not be recorded and will be treated confidentially and should you wish, Safecall will guarantee your anonymity.

When raising a report on their website you have the option to be named, semi anonymous or anonymous.

5 Making a report

If you become aware, or have reason to suspect, that unethical, illegal or other improper circumstances or behaviours connected to Diploma are contemplated, occurring, or may have occurred, you are encouraged to raise your concerns in a timely manner.

You should provide as much information about the issue as you can to help address the concern effectively, including but not limited to:

- background, history and reason for the concern,
- dates, places and, if possible, names or identifying details of those involved,
- any documents or references that may be relevant to the situation or you think could help Diploma investigate the issues.

If you do not have all these details, do not let this hold you back from raising your concerns and providing additional details later if possible.

For concerns relating to your own position or circumstances at work including grievances that do not relate to a possible breach of this policy, we encourage you to raise these concerns directly with your line manager or your local HR Team.

6 How Diploma will respond

The key steps when you voice your concerns under this policy include the following:

Report | After you have raised your concerns, the person to whom the allegation has been reported will make a record of its receipt. If you use the confidential hotline, then your report will be communicated on a confidential basis to the [Group General Counsel](#) for action.

Review | Diploma will then decide how to respond in a responsible and appropriate manner.

Investigate | It may be necessary to investigate at a later stage which may be formal or informal depending on the nature of the concern raised.

Close | Where the investigation confirms that wrongdoing has occurred, appropriate disciplinary action will be taken and if appropriate, criminal proceedings may be instituted.

Update | As far as possible, we will keep you informed of the decisions taken and the outcome of any enquiries and investigation conducted. However, we will not be able to inform you of any matters which would infringe the duty of confidentiality which Diploma owes to others. You are likewise required to keep confidential any information provided to you.

The person in receipt of the allegation may consider that an investigation would be inappropriate for whatever reason. This option will not apply where an allegation has been dismissed following an investigation. Anonymous allegations are not automatically disregarded but given the safeguards which are in place for those making allegations under this policy, anonymous allegations are usually less powerful than those from named individuals.

The objective of this policy is to provide a process to encourage individuals to raise genuine concerns. It may be, however, that the complainant has been involved in wrongdoing. In such a situation, they would have to answer for their actions and should not expect immunity from disciplinary/criminal proceedings. In such circumstances, however, the fact that they raised the concern would normally be considered in mitigation.

7 Protection from retaliation

Diploma prohibits and does not tolerate retaliation or detrimental conduct in response to you raising a concern or being able to raise a concern.

Diploma will protect you from being retaliated against or being subject to detrimental conduct, having the ability to, contemplating or in fact raising concerns in good faith or in circumstances which issues raised in your report turn out to be mistaken or unfounded.

Protection against detrimental conduct or retaliation also applies to individuals conducting, assisting or participating in an investigation under this policy.

8 How to raise your concern externally

The primary objective of this policy is to provide you with the opportunity and necessary protection to voice your concerns internally, either through management channels or the confidential hotline. In nearly all instances, raising concerns internally is the most suitable course of action. However, should you find yourself unable to raise your concerns internally for any reason, you have the option to consider escalating them externally. We advise that you seek legal counsel before pursuing this route, as we believe it is in your best interest to do so.

9 Compliance & Non-Compliance

As far as associated persons are concerned, a breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract, or other agreement.

The following will constitute a disciplinary offence and will be dealt with in accordance with Diploma's Disciplinary Procedure which can be found in our Group [Code of Conduct](#):

- Where it is found that an employee has abused this policy by making allegations which are not in good faith or has made a deliberately false or malicious allegation.
- Anyone who is found to have breached this policy by neglecting to report or escalate a breach or suspected breach of our policy without good reason, or by retaliating or being party to retaliatory conduct against any person within the scope of this policy.
- Any breach of this policy that causes damage to the reputation of Diploma, its stakeholders, its employees or any third party or which brings Diploma into disrepute will amount to either misconduct or gross misconduct (depending upon the seriousness of the breach).

10 Contacts

10.1 Diploma PLC

Chris Davies, Chief Financial Officer
Tel: +44 (0)20 7549 5700
Chris.Davies@diplomapl.com

Johnny Thomson, Chief Executive Officer
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Group Legal Team
Legal@diplomapl.com

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