

WHISTLEBLOWER POLICY (CONFIDENTIAL DISCLOSURE)

Purpose of this policy

This policy provides guidance on how to raise concerns around suspected wrongdoing. You should report all concerns in good faith, even where they turn out to be mistaken. Your concerns will be taken seriously and investigated as appropriate, and your confidentiality will be respected.

Please note that any complaints you may have as a result of your personal situation must be dealt with in accordance with your local grievance procedures, not this policy. Further details can be obtained from your local human resources department.

What behaviour is considered wrongdoing?

We define wrongdoing as an intent, action or a failure to act (whether in the past, present or future) where this behaviour could result in:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- misrepresentation;
- breach of our internal policies and procedures, including those listed on our public website and internal HR policies;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- conflict of interest
- Gift and/or hospitality which deviates from our approvals process (see Code of Business Conduct)
- Slavery or trafficking
- Dishonesty, or
- the deliberate concealment of any of the above matters.

Raising a concern

If you feel that you have a concern you should report it using the hotline or confidential email on page 3. If you are uncertain as to whether something falls within the scope of this policy, you should seek advice from the Head of Legal and/or Company Secretary.

Once you have raised a concern, a meeting will be arranged as soon as possible to discuss the facts. You may bring a colleague to any such meetings, but your companion must respect the confidentiality of your disclosure and any subsequent investigation. A written summary of your concern will be noted and you will be provided with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Investigation and outcome

Following the initial meeting, we will carry out an assessment to determine the scope of any investigation and inform you of the outcome. You may be required to attend additional meetings in order to provide further information.

We will aim to keep you informed of the progress of the investigation and the likely timescales. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that false allegations have been made maliciously, in bad faith or with a view to personal gain, the individual who raised the concern will be subject to disciplinary action.

Protection and support

We encourage openness and will support those who raise concerns in good faith, even if they turn out to be mistaken. Nobody should suffer any detrimental treatment as a result of their actions taken in good faith. If you believe that you have suffered as a result of your use of this policy, you should inform the Head of Legal and/or Company Secretary immediately.

Confidentiality

We hope that you will feel able to voice your concerns openly, however, if you wish to raise an issue confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

If you are concerned about possible reprisals if your identity is revealed, we will take appropriate measures where possible to preserve confidentiality.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. It is hoped that you should not find it necessary to alert anyone externally. However, we strongly encourage you to seek advice before reporting a concern to anyone external. In the UK, the independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Contact details for Public Concern at Work can be found below.

Whilst most concerns usually relate to internal conduct, they may sometimes relate to the actions of a third party, such as a customer, a business partner or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first either to your immediate manager or you can use the contact details below.

Contact information

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|--|---|-----|---------------|------------|--------------------|-----|-----------------|-----------|--------------|---------|----------------|------------|--------------|------|---------------|------|------------------|
| Group Chief Executive | Steve Blair Tel: +44 (0) 7901 257 558 Email: steve.blair@dialight.com | | | | | | | | | | | | | | | | |
| Head of Legal | Billy Harkin Tel: +44 (0) 7753 795 593 Email: billy.harkin@dialight.com | | | | | | | | | | | | | | | | |
| Company Secretary | Laura Walker Tel: +44 (0) 7469 859 505 Email: laura.walker@dialight.com | | | | | | | | | | | | | | | | |
| Safecall – confidential & independent whistleblower hotlines: | <p>Dialight@safecall.co.uk www.safecall.co.uk/reports</p> <table> <tr> <td>UK:</td> <td>0800 915 1571</td> </tr> <tr> <td>Australia:</td> <td>0011 800 7233 2255</td> </tr> <tr> <td>EU:</td> <td>00800 7233 2255</td> </tr> <tr> <td>Malaysia:</td> <td>1800 220 054</td> </tr> <tr> <td>Mexico:</td> <td>01800 123 1758</td> </tr> <tr> <td>Singapore:</td> <td>800 448 1773</td> </tr> <tr> <td>UAE:</td> <td>8000 441 3376</td> </tr> <tr> <td>USA:</td> <td>001 866 901 3295</td> </tr> </table> | UK: | 0800 915 1571 | Australia: | 0011 800 7233 2255 | EU: | 00800 7233 2255 | Malaysia: | 1800 220 054 | Mexico: | 01800 123 1758 | Singapore: | 800 448 1773 | UAE: | 8000 441 3376 | USA: | 001 866 901 3295 |
| UK: | 0800 915 1571 | | | | | | | | | | | | | | | | |
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| EU: | 00800 7233 2255 | | | | | | | | | | | | | | | | |
| Malaysia: | 1800 220 054 | | | | | | | | | | | | | | | | |
| Mexico: | 01800 123 1758 | | | | | | | | | | | | | | | | |
| Singapore: | 800 448 1773 | | | | | | | | | | | | | | | | |
| UAE: | 8000 441 3376 | | | | | | | | | | | | | | | | |
| USA: | 001 866 901 3295 | | | | | | | | | | | | | | | | |
| Public Concern at Work (independent whistleblowing charity - <i>UK only</i>) | Helpline: + 44 (0) 20 3177 2520 Website: https://protect-advice.org.uk/ | | | | | | | | | | | | | | | | |