



Authority: Compliance Manager

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Annex C - Whistleblowing Policy

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1 INTRODUCTION

Vesper Group believes that good communication at all levels throughout the organization promotes better work practice. Vesper Group seeks to conduct itself honestly and with integrity at all times. However, we acknowledge that all organizations face the risk of their activities going wrong from time to time, or of unknowingly harboring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. On this basis, staff and volunteers are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals and Vesper Group will protect them from victimization and dismissal.

Vesper Group undertakes to take steps to protect its workers from detrimental treatment or dismissal if they raise concerns in good faith.

2 AUTHORITY FOR WHISTLEBLOWING POLICY

Overall authority for this policy sits with the Vesper Board. All line managers have a specific responsibility to facilitate the operation of this policy and to ensure that staff feels able to raise concerns, without fear of reprisals, in accordance with the procedure set down in this policy. All staff is responsible for the success of this policy and should ensure that they take steps to disclose any suspected, actual or potential wrongdoing or malpractice of which they become aware.

3 SCOPE

This policy applies to all Vesper Group employees and sub-contractors. Vesper Group has introduced these procedures to staff to raise or disclose concerns about malpractice in the workplace at an early stage and in the right way, and they apply in all cases where there are genuine concerns or is of public interest, regardless of where this may be and whether the information involved is confidential or not.

The term 'malpractice' includes but is not exhaustive of:

- Criminal offences;
- Breaches of the Vesper Group Code of Conduct;
- Human Rights violations;



- The concealment of any of the above.

If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not be at risk of losing their job or suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

4 PROCEDURE FOR RAISING A CONCERN

If you believe that the actions of anyone (or a group of people) working for Vesper Group do or could constitute malpractice you should preferably raise the matter with your line manager. Where this is not appropriate because the line manager is involved in the alleged malpractice in some way, the matter should be raised directly with a member of Vesper Management, by emailing compliance@vespergroup.se. You may raise your concern verbally or in writing and should include full details and, if possible, supporting evidence. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential. If you do not wish to contact Vesper Management with your concern, you can file a report anonymously through Lantero online whistleblowing-service (<https://lantero.report/vesper>). If there is suspicion of criminal offence, all information will be handed over to competent authorities. If the case is a breach of internal policies or procedures, an internal investigation will be launched.

5 CONFIDENTIALITY

Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardize the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure. It is possible, however, that your role as the whistleblower could still become apparent to third parties during the course of an investigation. Equally, should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the authorities.



6 ANONYMOUS REPORTING

Anonymous disclosures are very difficult to act upon as there may be little or no corroborated evidence to substantiate the allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feed back or ascertain whether your disclosure was made in good faith if you do not provide the details either to your line manager, in an email to compliance@vespergroup.se or at the Lantero reporting site <https://lantero.report/vesper>. Disclosers complete a form at an external independent website set up specifically for Vesper, but completely isolated from our network. A specially appointed group of trustees receives information, investigates cases, and files recommendations to the management for action or further case handling. Investigators sometimes require additional information. All email addresses provided by disclosers are anonymized, which means investigators can contact them by email without either personal details or email address being visible to the investigators or anyone else. After investigations are completed, employees receive email summaries of how their cases were assessed.

Our recommendation is always for employees to try to speak to your supervisor or line manager first, and for external parties to initiate an open dialogue with a senior representative at Vesper Group. But if for some reason you wish to remain completely anonymous, the external Lantero reporting channel is there as an alternative.

7 SUPPORT FOR WHISTLEBLOWERS

Once a disclosure is made through the chain of command or feedback-mail, a member of the Executive Team will be allocated as your key contact to keep you up to date with the matter and provide any specific support that you may need. No member of staff who rises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action, even if the concerns turn out to be unfounded. Detriment includes unwarranted disciplinary action and victimization. If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, you should inform your allocated member of the Executive Team immediately. Workers who victimize or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.



8 HOW A DISCLOSURE WILL BE HANDLED

All disclosures will be taken seriously and the following procedure will be used.

1. If you have any personal interest in the matter you have raised you must disclose this at the outset. This procedure is not intended to replace the normal grievance handling, which continues to be the appropriate way to raise personal issues relating to your specific job or employment.
2. Your disclosure under this policy will be acknowledged in writing confirming that the matter will be investigated and that Vesper Group will get back to you in due course.
3. A suitable person will be identified to manage the disclosure. This will be someone in the position to take any necessary action as an outcome.
4. A suitable individual will be instructed to investigate the allegation (they will have had no previous involvement in the matter). We aim to start the investigation within two weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.
5. You may be asked to provide more information during the investigation.
6. The investigation report will be reviewed by the person managing the disclosure.
7. Appropriate action will be taken – this could involve initiating a disciplinary process, or informing external authorities if a criminal action has been committed e.g. fraud or theft. We will endeavor to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.
8. If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the manager to take a more informal approach to dealing with the matter.
9. You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report.
10. Possible outcomes of the investigation could be that:
 - the allegation could not be substantiated; or
 - action has been taken to ensure that the problem does not arise again. You will not, however, be given details about the action taken as this could breach the human rights of the person(s) involved.
11. If you are not satisfied with the received response, you should raise the matter with the Executive Management Team or Ethics Committee outlining your reasons.
12. If you have asked to remain anonymous, care will be taken to respect this request.



9 CORRECTIVE ACTION AND COMPLIANCE

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigator to enable Vesper Group to minimize the risk of the recurrence of any malpractice or impropriety which has been uncovered. Vesper Board, with support of the Quality Management Representative, will be responsible for reviewing and implementing these recommendations in the future according to the non-conformity, corrective and preventive process.

10 FALSE DISCLOSURES

Vesper Group will treat all disclosures of malpractice seriously and protect staff that raises concerns in good faith. However, appropriate disciplinary action will be taken against any employee who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate. This may result in dismissal.

Signature of employee_____Date_____

Printed name of employee_____