

BELLROCK GROUP

Bellrock Speak Up Policy

Speaking up helps us protect our people, our clients, our suppliers and our communities.

VERSION

1.0

EFFECTIVE

July 2026

OWNER

General Counsel

NAVIGATION

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FRONT MATTER

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FOREWORD

Message from the CEO

At Bellrock, integrity is fundamental to who we are.

We believe that concerns should be raised early, investigated fairly and used as an opportunity to improve.

Speaking up protects people. It protects our clients.
It protects our business.

Whether you work for Bellrock, work with Bellrock or interact with Bellrock in any capacity, we encourage you to raise concerns where something doesn't seem right.

Every concern will
be treated seriously.

Carlo Alloni

Chief Executive Officer

01

Introduction

This Speak Up Policy explains how concerns can be raised regarding unethical, unlawful or inappropriate conduct connected with Bellrock.

It complements our Code of Ethics and Conduct and our Supplier Code of Conduct by providing a safe and confidential way to report concerns.

THIS POLICY APPLIES TO

- Employees
- Suppliers
- Clients
- Agency workers
- Subcontractors
- Members of the public
- Contractors
- Consultants
- Anyone working with or on behalf of Bellrock

WHEN SHOULD YOU SPEAK UP?

If something doesn't seem right.

02

Our Commitment

PRINCIPLE	OUR COMMITMENT
01	integrity
02	openness
03	accountability
04	confidentiality
05	no retaliation

03

What concerns should be raised?

Bellrock encourages concerns relating to:

● Fraud	● Health & Safety	● Conflicts of interest
● Bribery	● Environmental issues	● Ethical concerns
● Corruption	● Harassment	● Breaches of the Code of Ethics
● Financial crime	● Sexual harassment	● Breaches of this Supplier Code
● Modern slavery	● Discrimination	● Any unlawful conduct
● Human rights	● Data protection	

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Speaking Up

You don't have to prove wrongdoing. Reasonable concerns are enough. Raise concerns as early as possible.

— BELLROCK ENCOURAGES PEOPLE TO:

- Raise concerns honestly.
- Report concerns promptly.
- Cooperate with investigations.
- Respect confidentiality.
- Ask questions if unsure.

— BELLROCK EXPECTS PEOPLE NOT TO:

- Ignore concerns.
- Conceal wrongdoing.
- Retaliate.
- Discourage others from speaking up.
- Knowingly make false allegations.

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Confidentiality

COMMITMENT	WHAT THIS MEANS
Bellrock will:	<ul style="list-style-type: none">● treat concerns seriously● protect identities where possible● investigate fairly● only share information where necessary
Bellrock will not:	<ul style="list-style-type: none">● tolerate retaliation● disclose identities unnecessarily

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How concerns are handled

Every concern is assessed individually.
Depending on the circumstances Bellrock may:

STEP	POSSIBLE ACTION
01	seek further information;
02	investigate internally;
03	appoint independent investigators;
04	notify regulators;
05	take disciplinary or contractual action;
06	improve policies and controls.

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Bellrock Speak Up

INDEPENDENT PROVIDER

TELEPHONE +44 (0) 116 464 0800

WEB www.bellrock.co.uk

EMAIL enquiries@bellrock.co.uk

Available 24/7

Anonymous reporting available

SCAN TO REPORT



www.bellrock.co.uk

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Protection from retaliation

Bellrock will not tolerate retaliation against anyone who raises a concern honestly and in good faith.

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Compliance

REF	EXPECTATION
01	We encourage concerns to be raised promptly.
02	Every concern is assessed appropriately.
03	Bellrock uses concerns to improve our culture, governance and controls.



Speaking up protects our people.

It protects our clients.

It protects our reputation.

Together we create a culture where doing the right thing is
everyone's responsibility.