

Whistleblowing Policy

Unblu CMS

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Public DOCUMENT

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CEO

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1 Introduction

This policy is designed to ensure that Unblu employees can raise their concerns about wrongdoing or malpractice within the Company without fear of victimization, subsequent discrimination, disadvantage, or dismissal.

It is also intended to encourage and enable staff to raise serious concerns within the Company rather than ignoring a problem or 'blowing the whistle' outside.

This policy aims to:

- Encourage staff to feel confident in raising small or serious concerns, questioning, and acting upon concerns related to Unblu activities.
- Provide means to raise those concerns and receive feedback on any action taken.
- Ensure that whistleblowers receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- Reassure staff that whistleblowers will be protected from possible reprisals or victimization if disclosures are made in good faith.

1.1 Scope

This policy applies to our company and its subsidiaries and is taken into consideration for all our business decisions. It may also refer to suppliers and partners (including nonprofit organizations) as appropriate.

1.2 Revision History

Revision	Date	Record of Changes	Approved By
1.0	4.1.2023	Initial Issue	Jens Rabe
1.1	18.1.2023	Changed document classification to Public	Martin Danell

1.2	17.01.2024	Changes COO to Co-CEO, yearly review, trivial changes, CA from Internal Audit.	Martin Danell
1.3	02.01.2025	Yearly review, trivial changes.	Martin Danell
1.4	15.01.2026	Yearly review, title updates & trivial changes	Martin Danell

1.3 Control of hardcopy versions

See the corresponding section in the **Unblu Information Security Manual**.

1.4 References

Standard	Title	Description
ISO 26000:2010	Guidance on social responsibility	Guidance on social responsibility

1.5 Terms and Definitions

- “Staff” and “users” mean all of those who work under our control, including employees, contractors, interns, etc.
- “We” and “our” refer to Unblu.
- HRIS - Human Resources Information System
- “Reporter” refers to a person who reports a concern - the ‘whistleblower’.
- “Concern” - any issue that a whistleblower reports following this process.

1.6 Responsibilities

The CEO is responsible for this policy unless noted otherwise.

Managers and supervisors are responsible for implementing this policy within the scope of their responsibilities and must ensure that all staff under their control understand and undertake their responsibilities accordingly.

2 Overview

Whistleblowing means the reporting by employees of suspected misconduct, illegal acts, or failures to act by Unblu staff, or by its leaders, or where Unblu is involved in another way.

This policy aims to encourage employees and others who have serious concerns about any aspect of activities related to Unblu to come forward and voice those concerns.

Whistleblowing is viewed by Unblu as a positive act that can make a valuable contribution to company efficiency and long-term success. It is not disloyal to colleagues or the company to speak up. The Unblu management team is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its activities. To help achieve these standards, Unblu encourages freedom of speech.

If an employee considers raising a concern, they should read this policy first. It explains:

- The type of issues that can be raised
- How the person raising a concern will be protected from victimization and harassment
- How to raise a concern

- How the company should follow up on reported incidents

3 What should be reported?

Any serious concerns about service provision or the conduct of Unblu staff or board members, or others acting on behalf of Unblu, such as:

- offenses or breaches of the law
- racial, sexual, disability, or other discrimination
- health and safety of the public and/or other employees
- damage to the environment
- unauthorized use of company assets
- possible fraud and corruption
- neglect or abuse of clients, or
- other unethical conduct
- breaches of Unblu's policies and procedures
- improper behaviour or harassment

4 Protecting the Whistleblower

Unblu is committed to good practice and high standards and to being supportive of its employees.

Unblu recognizes that the decision to report a concern can be a difficult one to make. If the reporter honestly and reasonably believes what he/she is saying is true, they should have nothing to fear because they are doing their duty to the employer, their colleagues, and customers.

Unblu will not tolerate any harassment or victimization of a whistleblower (including informal pressures) and will take appropriate action to protect the reporter raising a concern in good faith, and will treat this as a serious disciplinary offense which will be dealt with under the disciplinary rules and procedure.

Support

Throughout this process, reporters will be given full support from senior management, their concerns will be taken seriously, and Unblu will take any appropriate action to help the reporter throughout the investigation.

Confidentiality

All reported concerns will be treated confidentially, if appropriate, or requested by the reporter, and every effort will be made not to reveal their identity if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to pursue the case without help from the reporter, for example, as a witness. In such cases, the reporter will be offered advice and support.

Anonymous Reporting

This policy encourages employees to put their names to their reports if possible, but anonymous reports are also welcome and will be handled with the same procedures, apart from respecting the confidentiality of the reporter. Anonymous reports can be submitted via the anonymous reporting channel in HiBob.

Untrue Allegations

If an employee makes an allegation in good faith and reasonably believes it to be accurate, but it is not confirmed by the investigation, Unblu will recognize the concern, and the reporter has nothing to fear. If, however, a reporter makes an allegation frivolously, maliciously, or for personal gain, appropriate action that could include disciplinary action may be taken.

5 How to report a concern

This may depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. Staff should normally raise concerns with any of the following channels.

1. The Line Manager
2. The Departmental Corporate Director
3. The VP HR
4. The CEO.
5. The anonymous reporting channel in HiBob

Reporters may wish to consider discussing their concerns with a colleague first and may find it easier to raise the matter if there is more than one person who has had the same experience or concerns.

6 Process for reported concerns

Unblu is committed to treating all reported concerns fairly and consistently.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under strict confidentiality, i.e., by not informing the subject of the complaint until (or if) it becomes necessary. In certain cases, such as allegations of ill-treatment of others, suspension from work may have to be considered immediately. The protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, HR, internal audit, or according to the Unblu ISMS A.7.1 Disciplinary Process
- be investigated by external forensic investigators
- be referred to the police or other authorities if it is a legal breach

Unblu should respond to the whistleblower within a reasonable time, acknowledging that the concern has been received, and indicating how Unblu proposes to deal with the matter.