



**nexwell**  
**POWER**

**NEXWELL POWER GROUP, AS PART OF NEXWELL GROUP, ADHERES  
TO UPDATED NEXWELL WHISTLEBLOWING POLICY AS AMENDED  
THE 18<sup>TH</sup> APRIL 2024 (ATTACHED)**

## NEXWELL WHISTLEBLOWING POLICY

Nexwell recognizes the importance and inherent value of its employees, and others working with us and on our behalf, being able to safely and reliably report any concerns relating to genuine acts of wrongdoing or impropriety.

Furthermore, Nexwell acknowledges that an individual, acting in good faith, may feel vulnerable when raising a genuine concern and, as such, Nexwell commits to take appropriate action to protect the individual against victimization, harassment, retaliation or disciplinary action. The primary aim of this policy is to root out behaviors that should not take place at Nexwell, and to ensure that such issues are investigated so they can be addressed in a fair and efficient manner.

A genuine concern includes any of the following:

- a criminal offence or breach of the law
- someone's health and safety are in danger
- risk or actual damage to the environment
- a miscarriage of justice
- unauthorized use of company funds or assets
- possible fraud or corruption
- money laundering and terrorist financing
- protection of privacy and personal data, and security of network and information systems
- competition law breaches
- corporate tax breaches
- belief that someone is covering up wrongdoing
- other unethical conduct

A genuine concern for the purposes of whistleblowing does not normally include personal grievances unless a particular case is in the public interest.

A concern should normally be raised with an individual's line manager or function head in the first instance. If an individual feels that this approach is not appropriate due to the seriousness or sensitivity of the issue, as a result of who is suspected, or any other reason, then they should report it to the legal team ([legal@nexwell.com](mailto:legal@nexwell.com)). If the concern involves a member of the legal team, then it may instead be reported to the CFO ([cfo@nexwell.com](mailto:cfo@nexwell.com)).

Alternatively, a concern may be raised in writing with the reference "Whistleblowing" to Nexwell, Appold Studios Level 1, 18 - 20 Appold Street, London - United Kingdom EC2A 2AS. The concern should be submitted in a sealed envelope clearly marked "Private and Confidential."

All whistleblowing concerns received by Nexwell will be taken seriously and, as such, will be made the subject of an investigation conducted under terms of strict confidentiality. The form of this investigation will be proportionate to the nature and extent of the concern raised. Where appropriate, the matters raised may be:

- investigated internally by an impartial person or department
- referred to the police or other enforcing authority
- referred to an external auditor
- investigated by another third party appointed by Nexwell or its shareholders

Within seven business days of an identified concern being raised through internal channels described herein,

the person investigating the concern will write to the individual raising the concern:

- acknowledging receipt of your concern
- indicating how the company proposes to deal with the matter
- explaining whether further investigations will take place and, if not, why not

Within a reasonable timeframe not exceeding three months thereafter, the person investigating the concern will provide additional feedback to the individual that raised the concern.

All information received will be protected with the utmost diligence and treated as confidential information, access to which will be restricted to those persons with a need to know such information. During and following the investigation, the confidentiality of the information in the reports shall be protected in accordance with applicable laws and internal policies. The identity of the reporting person and any third party mentioned in the report will remain confidential. Where an individual is not comfortable raising their concerns openly, they may raise them anonymously. The individual should consider the limitations of raising concerns anonymously given they cannot be contacted for further information or progress updates.

The reporting person shall be protected from any victimization, harassment, retaliation or disciplinary action. Even if a complaint is not sustained as valid evidence or an investigation concludes without charges being brought, the reporting person shall be protected against any victimization, harassment, retaliation or disciplinary action so long as they acted in good faith.

Further information and guidance, please refer to the applicable link below:

An overview of US whistleblower protections case be viewed at:

<https://www.dol.gov/general/topics/whistleblower>

The UK Public Interest Disclosure Act 1998 can be viewed at:

<https://www.legislation.gov.uk/ukpga/1998/23/contents>

The EU Directive can be viewed at: [https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019L1937-20230502)

[content/EN/TXT/?uri=CELEX%3A02019L1937-20230502](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02019L1937-20230502)