

Whistleblower Policy

Policy statement

Infirst is committed to high standards of ethical corporate behaviour towards our colleagues and other stakeholders. This Policy sets out our commitments to encouraging and facilitating individuals to raise concerns (“Speak Up”) relating to malpractice or impropriety within or involving Infirst. The Policy sets out the channels via which you can Speak Up responsibly and effectively. Infirst is committed to addressing promptly, fairly and confidentially, Speak Up concerns that are reported to us.

Who does this policy apply to?

This Policy applies not only to employees of Infirst, but also to any individuals on work experience, agency workers, consultants, shareholders, and any others acting on behalf of, or working with, Infirst. References in this Policy to individuals raising a grievance in certain circumstances apply to Infirst employees only.

Why should I speak up?

At one time or another we have all had concerns about how things are being done at work. Usually, these concerns are easily resolved. However, when the concern is not about your own position but is about a risk to colleagues, patients, consumers, suppliers or Infirst, it can be difficult to know what to do. You may feel worried about raising such an issue and decide to keep your concern to yourself, perhaps feeling that it is none of your business or that it is only a suspicion. However, if something is troubling you that you think Infirst should know about or look into, we would strongly encourage you to raise it at the earliest opportunity. If we don't know about it, we can't fix it.

Please remember that although you need to have a reasonable belief that malpractice has been, is being or is likely to be committed, you do not need to have firm evidence of malpractice to raise a concern.

What should I speak up about?

Although not an exhaustive list, Speak Up is intended to be used to raise concerns over malpractice including:

- Duty of care concerns
- Failure to comply with a legal, compliance or regulatory obligation
- Other criminal offences or illegal acts (including fraud)
- Miscarriage of justice
- Serious misuse or abuse of authority
- Concerns regarding widespread racism, discrimination or sexual harassment, potentially affecting multiple individuals
- Improper conduct or unethical behaviour or behaviours
- Child protection and safeguarding or modern slavery
- Accounting, auditing matters or financial reporting practices
- A serious breach of the Company's policies which is causing harm to others
- Concealment of information relating to any of the above.

How do I raise a concern?

- 1.If you feel able to raise your concern openly with your line manager, this is the best course.
- 2.If you feel unable to raise your concern with your line manager, then consider raising it with the Managing Director (if they are not your line manager) in writing.
- 3.If you feel unable to raise the matter with your line manager, or the Managing Director, or you think they have not properly addressed your concern, please raise your concern, in writing, with any of our non-Executive Directors:

Manfred Scheske – manfred.scheske@infirst.co.uk

Alan Armstrong – alan@iwcapiatal.co.uk

Robin Lincoln – robin.lincoln@hambroperks.com

Richard Huston – rjwhuston@outlook.com

Handling of Speaking Up concerns

- 1.Any recipient of a Speaking Up concern under this policy should keep the identity of the individual raising the concern confidential.
2. No-one raising a concern will be disadvantaged as a result of Speaking Up, whether the concern is proven or not, so long as the concern is genuine. Infirst will not tolerate any retaliation (including threats of retaliation) against an individual for raising a concern, making a report or assisting in an (internal or external) investigation.
3. Once you have raised your concern, the recipient should assess it and consider what action is appropriate. This may involve an informal review, an internal enquiry or a more formal investigation.
4. Any matters reported to the Managing Director or a Non-Executive Director under this policy will be reported to the Board together with an explanation of the Company's response.

Matters for which this policy should not be used

- Report events presenting an immediate threat to life or property. Please use an appropriate emergency procedure or where applicable the relevant Company procedure.
- Report any grievances or personal employment issues you may have in relation to your personal terms of employment; these should be taken up with the Managing Director. This includes disputes about pay, hours or conditions in the workplace.
- Settle personal or legal disputes.
- Make accusations which you know are false. Doing so may lead to disciplinary measures.

Approved by the Managing Director

Philip Lindsell
Managing Director
February 2024