

V&MP Terminals & Accessories Ltd
Trading as V&MP Crimp N Fix

Speak-Up and Whistleblower Policy

1. Introduction

The principles and values set out in our Code of Conduct, available by email, are a fundamental part of our organisational culture: our Leadership Team and the Board are committed to promoting an open and accountable culture where employees are able to Do The Right Thing. Employees can express concerns in the knowledge they will be taken seriously without fear of discrimination or retaliation. If something is troubling you and you have concerns about an illegal or unethical act or breach of our Code of Conduct which you think we should know about or look into, please tell us.

2. Purpose and Scope

The purpose of this policy is to set out how you should report any concerns you have about an illegal or unethical act, or a breach of our Code of Conduct, and how the Group would deal with your report.

This policy covers all **V&MP Crimp N Fix** Employees and anyone who develops a concern in a work-related context (including former employees, shareholders, trainees/interns, contractors, suppliers and subcontractors).

3. What Does the Policy Cover?

This policy covers any illegal or unethical practices, or any breach of the Group's Code of Conduct or policies, which could include the following (this is not an exhaustive list):

- Criminal offences, including theft, money laundering, fraud and bribery
- Failure to adhere to legal obligations (including competition law or tax law concerns)
- Bullying or harassment, including sexual harassment
- Data privacy or the security of network and information systems
- Actions which endanger the health and safety of our employees or the public or which present a serious risk to the environment (including product safety or compliance concerns)
- Human Rights and Modern Slavery
- Breaches of any Group or local policy
- Retaliation for raising a concern in good faith

Any activity falling under the categories above should be reported under this policy. You will need to use your judgment as to whether a particular action or inaction falls within these categories. If something is troubling you which you think the Group should know about or look into, please report it. If in doubt – Speak Up!

4. Safeguards

We recognise that the decision to 'speak up' can be difficult. We will not tolerate any retaliation or victimisation and will take appropriate action to protect any person who raises a concern in good faith, including any necessary disciplinary action against anyone retaliating or victimising a Speak Up reporter due to their report.

Reports and the identity of persons involved will be treated with confidentiality. Information will only be shared with those people or organisations who need to know for the purposes of undertaking the investigation.

We will protect individuals from false or malicious reports. Disciplinary action will be taken against any member of staff who is discovered to have deliberately made allegations falsely or maliciously.

We recognise that a concern that is sincerely felt and expressed may, on investigation, prove to be unfounded. In such cases, we will try and ensure that the negative impact of either a false or unfounded allegation on any person is minimised as far as possible.

5. How to Make a Report

Reports can be made either orally or in writing. There is no required format, and no proof of your concerns is necessary. However, you will need to provide the reasons for your concern, and the more information you can provide the better.

When raising a concern you should, if you are a Group Employee, report it first to your line manager or local People team; however, if you prefer, you can raise it with a member of your local senior management team, or if you don't feel comfortable making your report at the local level, you can do so to one or more of the following:

- Gavin Porter – Director

There is also the option for anyone to make a report by emailing compliance@vandmp.co.uk. Reports can be made anonymously and you do not need to use an email address that includes your name, if you do not wish to. All received emails will be treated in line with this policy and the inbox is only accessible by the Director and/or a senior compliance office.

6. Our Response

The action that we take will depend on the nature of the report. The matters raised may be investigated by local management, Group management, Group Operational Audit, or Group Legal. Some cases may be referred to the People team to progress through the grievance process or the disciplinary process. Alternatively, they may be subject to independent inquiry. Relevant matters may also be subject to investigation by external agencies such as law enforcement. Initial enquiries will determine the most appropriate process for the consideration of the report – in all cases the independence of the investigation will be a key factor in that determination. Any necessary action that is required urgently would be carried out ahead of any assessment/investigation process.

Each report will be acknowledged within 7 days. We will also indicate to you how we propose to progress the matter. We will then provide you with a status update no later than 3

months from the date of the original report. If a decision is made not to investigate under the Speak Up policy, an explanation will be provided of the reasons for the decision.

Some issues may be investigated without the need for initial enquiries to be made. Similarly, some concerns may be capable of resolution by agreed action without the need for investigation. Concerns or allegations raised which fall within the scope of specific established procedures will be referred for consideration under those procedures.

You will be given as much information as possible on the outcome of the investigation, subject to the constraints of the Group's duty of confidentiality or any other legal constraint, to ensure as far as possible that you can be assured that your concern has been considered and addressed if necessary.

Although we cannot guarantee that we will respond to all matters in the way that you might wish, we will always handle the matter fairly and properly. By following this policy, you will help us to achieve this.

7. Local Requirements

Some countries may have additional or stricter Whistleblowing/Speak Up legislative requirements than those contained in this policy. Where local legislation has additional or stricter requirements those requirements will be applied to this policy.

8. Governance

The Speak Up process is managed by the Head of Group Compliance and Ethics and the General Counsel. Speak Up reports and this policy are monitored and overseen by the Board.