

Whistleblowing Policy

POL.08-01

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WHISTLEBLOWING POLICY

1. Purpose of the Policy

- 1.1 As Kew Soda Ltd and its subsidiaries (and references to “Company”, “WE Soda”, “Group”, “we”, “our”, “us”, and similar shall refer to the Kew Soda Group) we are committed to conducting our business with honesty and integrity and we prioritise the sustainable implementation and adoption of our ethical rules to maintain an ethical behaviour culture. This policy aims to guide our officers, employees and contractors to report any legal, policy, or ethical code violations or any other wrongdoing that they detect or suspect on a confidential basis, without being subject to any retaliation or grievance.

2. Policy Application

- 2.1 This policy applies to all WE Soda officers, employees and contractors globally, including all subsidiaries and affiliates and WE Soda business partners.

3. Scope of the Policy

- 3.1 Whistleblowing is the reporting of any suspected wrongdoing in relation to the activities of our Company and its subsidiaries. Issues that can be reported under this policy generally consist of:

- Violation of laws and regulations applicable to the Company and its subsidiaries;
- Violation of Company policies; and
- Violation of the Company’s code of ethics.

- 3.2 Examples of reportable actions include, but are not limited to:

- Corruption (blackmail, bribery, conflict of interest, fraud, money laundering, theft etc.)
- Facilitation of tax evasion
- Accounting errors and books & records violations
- Anti-competitive practices
- Information security violation
- Data Privacy violation
- Intellectual Property / Trade mark
- Compliance with other laws
- Insider Trading
- Modern slavery and human trafficking crimes
- Discrimination and harassment
- Human rights violation including employee safety concerns, workplace violence

- Health and safety risks; and
- Damage to the environment

3.3 This policy should not be used for complaints limited to your own personal circumstances, such as the way you have been treated at work. Please refer to the Grievance Procedure for the protocols associated with escalating certain issues that may not be covered by this Policy. Contact the HR Department for further details.

4. Reporting Concerns

4.1 WE Soda has multiple reporting mechanisms for people to raise their concerns and speak-up safely and anonymously – where allowed by applicable laws. You will be able to report concerns with your line manager, your line manager's manager or head of the department. You may tell them verbally or put the matter in writing if you prefer. In turn, line manager or department head must submit the reported matter through one of the Reporting Channels to document, process and archive.

4.2 However, where a matter requires an immediate action due to the severity of the concern or you feel that the reported matter has not been addressed, or you prefer not to raise it with them for any reason, you may report the concern directly through one of the WE Soda Reporting Channel and directly to the Whistleblowing Officer using the procedure below.

4.3 We expect that detailed information is given in a notice, in order to ensure that a concern can be investigated quickly and efficiently. We have listed below certain items that would be helpful if included in the notice of a concern for a successful review of the matter:

- The place, date, and time of the concerned event.
- Names and positions of the person(s) involved.
- Relationship of the notifying person with the person(s) involved.
- The general nature of the concern and summary of wrongdoings.
- How the issue was noticed.
- Witnesses, if any.
- Any other supporting information.

5. Notification of Concerns

5.1 The following Reporting Channels are available to notify and raise the concerns :

- Raise concerns with your line manager or department head verbally or in writing
- Raise your concerns with a member of the Senior or Executive Leadership Team verbally or in writing
- Raise your concerns with a member of Compliance, Legal or HR teams verbally or in writing
- Report at via email to wespeakup@wesoda.com

- Via our [we • speakup](#) platform
- Send a letter via post to

Attn: Whistleblowing Officer

Address: WE Soda Ltd, 23 College Hill, London, EC4R 2RP

For allegations involving any member of WE Soda Executive Management or for allegations involving a potential breach of a law “serious reportable matter” would require an immediate escalation to Whistleblowing Officer.

All concerns raised will be treated with discretion and investigated diligently. As a result of the investigation, appropriate corrective action(s) may be taken based on the findings of the reported matter,

6. **Anonymous Notifications**

- 6.1 Notifications can be made anonymously. However, we need to note that completely anonymous disclosures are difficult to investigate and may prevent the matter from being fully examined. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. If you are concerned about possible reprisals or retaliation, please raise your concern immediately via wespeakup@wesoda.com or directly to Whistleblowing Officer so appropriate measures can be considered. Global Head of Compliance is appointed as Whistleblowing Officer.

7. **Whistleblower Protection**

- 7.1 We will make every effort to keep the identity of the reporting person confidential unless we have his/her permission or we are required by law to disclose it, or where revealing it is necessary to those involved in investigating the whistleblower’s concern.
- 7.2 Within the scope of this policy, we undertake that we will take all necessary measures to protect the whistleblower from retaliation and all kinds of victimisation. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Global Head of Compliance immediately.
- 7.3 You must not threaten or retaliate against whistleblowers in any way. If any of our employees or workers are involved in such conduct they may be subject to disciplinary action.

8. **False or Maliciously Allegations**

- 8.1 We expect the whistleblower to have reasonable grounds to believe that the reported issue is accurate. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to action under our Disciplinary Procedure.

9. **Handling of Reported Concerns**

- 9.1 The Whistleblowing Officer is responsible for investigating all serious reportable matters reported via any Reporting Channel listed above.

The Whistleblowing Officer will examine and record all such serious reportable matters and concern reports and investigate as required or delegate to another investigator. In appropriate circumstances, the Whistleblowing Officer will report the matter to the Board of Directors and will make every effort to ensure that all necessary measures are taken to resolve and end any relevant wrongdoing.

- 9.2 All other type of reportable matters is to be examined, recorded and investigated by Compliance Function as required and to be reported to Whistleblowing Officer timely and regularly for review and consultation.
- 9.3 The investigation process referred to in this policy will be conducted fairly and confidentially as far as permitted by applicable law and insofar as possible while still conducting a thorough and sufficient investigation. There will be no assumption about the outcome of the investigation until the investigation is completed. The investigation will aim to reveal sufficient evidence to vet the reported issues.
- 9.4 We will provide the following information in writing within a reasonable time to the notifying person:
- Confirmation that the complaint has been received;
 - Estimated time required for a final response and
- 9.5 If deemed necessary, we will arrange a meeting with you as soon as possible to discuss your concern. You may request to bring a colleague or union representative to any meetings under this policy (and such requests will be granted where reasonable). Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide further information.
- 9.6 In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 9.7 We will aim to keep you informed of the progress of the investigation and its likely timescale, though it is not always possible to give you specific details.

10. Appeals

If you are not happy with the way in which your concern has been handled by WE Soda, you can raise it with the Chair of the Risk and Audit Committee or our external auditors. Contact details can be requested from the HR Department.

11. External disclosures

- 11.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 11.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.
- 11.3 The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed external auditors for reporting certain types of concern. Their contact details are as follows:

Helpline: 0203 117 2520

Email: info@protect-advice.org.uk

Website: <https://protect-advice.org.uk/contact-protect-advice-line/>

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