RGIS®

WHISTLEBLOWER POLICY

1. DEFINITIONS

For the purpose of this Policy:

- **Code of Conduct** means the RGIS Code of Conduct and Ethics (as updated from time to time).
- **Concern** means any suspected or actual misconduct, wrongdoing, unethical behaviour, or breach of the Code of Conduct, RGIS policies, or applicable law.
- **Good faith** means reporting honestly, based on a reasonable belief that the information is true at the time of reporting, even if it is later found not to be substantiated.
- **Investigation** means a process to assess and review a reported Concern, which may include fact-finding, interviews, document/system review, and recommendations for action.
- **Retaliation** means any adverse action taken because a person made a report, supported a report, or participated in an investigation. Retaliation may include (for example) dismissal, demotion, loss of shifts/hours, threats, intimidation, harassment, discrimination, discipline, negative treatment, or termination of a commercial relationship.
- **Whistleblowing/Whistleblower report** means reporting a Concern in good faith through the reporting channels described in this Policy and in the Code of Conduct.
- **Whistleblower** means any person who makes a Whistleblower report under this Policy, including employees and external stakeholders.

2. PURPOSE

RGIS is committed to conducting business ethically, lawfully, and in line with the RGIS Code of Conduct. This Whistleblower Policy is intended to promote a workplace and business environment where employees and other stakeholders feel safe and supported in raising concerns.

RGIS encourages anyone to speak up when they believe something may be wrong. Reporting concerns helps RGIS identify and address issues at an early stage, reduce the risk of misconduct, protect employees, customers and the business, and maintain trust and integrity in how we operate. By fostering open reporting, this policy supports continuous improvement across the organization. Early identification of potential issues helps prevent financial losses, reputational damage, regulatory non-compliance, and harm to people or the environment, while reinforcing our dedication to transparency, accountability, and long-term sustainable success.

3. SCOPE

This Policy applies to all RGIS stakeholders. This includes employees (whether permanent, temporary or part-time), contractors, agency workers and interns, as well as suppliers, service providers, consultants, business partners, customers and other third parties interacting with RGIS.

This Policy covers concerns relating to suspected or actual misconduct, including potential violations of the Code of Conduct or internal policies, breaches of applicable law or regulatory requirements, fraud, theft, bribery or corruption, conflicts of interest or unethical business practices, harassment, bullying or discrimination, health and safety risks, and confidentiality, data protection or information security issues. It also includes concerns about attempts to conceal wrongdoing, interfere with an investigation, or retaliate against someone for raising a concern.

For EU-related matters, RGIS aims to uphold the principles and requirements of the EU Whistleblowing Directive (Directive (EU) 2019/1937), as implemented in relevant local laws across EU Member States. For UK-related matters, RGIS aims to uphold the whistleblowing protections set out under UK law, including the Public Interest Disclosure Act 1998 (PIDA).

4. KEY PRINCIPLES

RGIS handles whistleblowing reports in line with these principles:

4.1 Speak-up culture

RGIS supports a culture where people can raise concerns without fear. Speaking up in good faith is always the right thing to do.

4.2 Confidentiality guarantee

RGIS will treat reports confidentially to the extent possible. Information will be shared in compliance with GDPR or equivalent data protection laws and only with those who need to know to assess the concern, investigate, take action, or meet legal requirements.

4.3 Anonymous reporting

Reports may be made anonymously, where permitted by local law and the reporting channel used. RGIS will assess anonymous reports in the same way as other reports. However, anonymous reporting may limit RGIS's ability to follow up or provide updates.

4.4 Non-retaliation guarantee

RGIS prohibits retaliation. No one will be disciplined, demoted, terminated, harassed, or otherwise treated unfairly for raising a concern or participating in an investigation, even if the concern is not substantiated.

Retaliation (or attempted retaliation) is a serious violation and may result in disciplinary action, up to and including termination of employment or the ending of a business relationship. Anyone who believes they have experienced retaliation should report it immediately using the channels below.

4.5 Fair process

RGIS reviews concerns objectively and takes proportionate action based on findings.

5. HOW TO RAISE A CONCERN (REPORTING CHANNELS)

Any stakeholder may raise a concern through any of the following channels :

- Your supervisor/manager (where appropriate)
- Human Resources
- Office of Legal/Office of General Counsel
- RGIS Business Ethics Hotline (email): **europeethics@rgis.com**
- Legal Europe (email): **legaleurope@rgis.com | ecordier@rgis.com**

Oral reports can also be made by requesting an in-person meeting with your supervisor, HR or Legal through the email channels documented above.

6. WHAT TO INCLUDE IN A REPORT

To help RGIS assess the report, provide as much information as possible, including:

- What happened (and why you believe it is wrong);
- Who was involved;
- When and where it occurred;
- Whether the issue is ongoing;
- Names of any witnesses; and
- Any relevant documents, messages, photos, or other evidence.

7. HOW RGIS HANDLES WHISTLEBLOWER REPORTS

RGIS follows a consistent process to handle reports appropriately.

7.1 Acknowledgement and triage

Where contact details are provided, RGIS will acknowledge receipt of the report within 3–7 business days. An initial review (triage) will then be conducted within 14 days to:

- Understand the concern;
- Assess urgency and any immediate risk (e.g., safety, ongoing harm);
- Determine who should handle the matter (e.g., Legal/Compliance, HR, local management); and
- Decide whether an investigation is required.

7.2 Investigation

Where appropriate, RGIS will investigate promptly and fairly. Investigations may be conducted by Legal/Compliance and may involve HR, Internal Audit, Security, or external advisors. RGIS may need to speak with relevant individuals and review documents or systems. All parties are expected to cooperate and maintain confidentiality. RGIS aims to complete investigations within 30–60 days, depending on the complexity and nature of the concern. Whistleblowers who are dissatisfied with the outcome or process may request a review/appeal through the same reporting channels.

7.3 Outcome and action

If misconduct is found, RGIS will take appropriate action. This may include:

- Corrective measures (process changes, training, controls);
- Disciplinary action (up to and including termination);
- Contract or relationship action with third parties; and/or
- Reporting to authorities where required by law.

If no action is taken (e.g., due to insufficient evidence or the concern not falling within the scope of this policy), the whistleblower will be informed of the reason(s) where possible. Whistleblowers are welcome to provide additional information if they believe important details were missed. Where appropriate and permitted by law, RGIS will provide the whistleblower with high-level updates at key stages (e.g., confirmation that an investigation has started and when it has concluded), without compromising confidentiality, privacy of others, or legal constraints.

8. PROTECTION AND SUPPORT

RGIS will take reasonable steps to protect whistleblowers from retaliation and to support them during and after the review process. This may include adjusting reporting lines, limiting information access, or other protective measures where appropriate.

9. FALSE OR MALICIOUS REPORTS

Reports must be made honestly and in good faith. While rare, knowingly false, malicious, or deliberately misleading reports undermine trust and may lead to disciplinary action, up to and including termination of employment or ending of a business relationship.

Reports made in good faith will not result in any adverse consequences, even if the concern is later found to be unsubstantiated. This protects the speak-up culture and encourages genuine concerns without fear of reprisal for honest mistakes.

10. RECORDKEEPING AND DATA PRIVACY

RGIS will keep records of reports, assessments, and outcomes in a secure manner and in line with applicable data protection and retention requirements. Access to records is restricted to authorised personnel, whistleblowers can request access to their report data under GDPR.

11. ROLES AND RESPONSIBILITIES

- **All stakeholders:** speak up promptly, provide truthful information, cooperate with investigations, and respect confidentiality.
- **Managers:** listen, take concerns seriously, and escalate promptly through the appropriate channel.
- **Legal/Compliance:** oversee the whistleblowing framework, triage high-risk matters, and manage investigations where appropriate.
- **Human Resources:** support employee-related matters, non-retaliation monitoring, and disciplinary processes where relevant.
- **Internal Audit/Security (as applicable):** support investigations and control improvements.

12. POLICY OWNER AND REVIEW

This Policy will be reviewed annually or following significant legal chances in legislation by Legal/HR, and updated where needed to reflect legal requirements and best practice.