



POLICY

Whistle blowing policy (CP.011)

VGC Value – “We achieve potential” - Expertise and ethics underpin our business

Vision

We run our business in an ethical and responsible manner and will ensure that any person who reports any genuine concerns by means of whistle blowing will not be treated unfairly or lose their job.

This applies to anyone who has concerns about events that happened in the past, are currently happening or may happen in the future. Our people are often the first people to identify any misconduct or illegal activities and VGC Group view whistle blowing as a positive act that can have a positive and beneficial contribution to our high standards of ethics.

Strategy

VGC is committed to delivering our services to the highest standards and with full accountability for our actions. We recognise that while fraud, mismanagement and illegal wrongdoing are unlikely, they may occur. Therefore, we have control measures to prevent these in line with the Public Interest Disclosure Act 2018.

This whistleblowing policy demonstrates our commitment to working fairly, safely, and ethically and in accordance with our legal obligations. It applies to all employees, officers, agency workers, contractors and suppliers of the company. Any incidents of malpractice are taken seriously and will be dealt with immediately should they arise.

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless the case is in the public interest. These should be reported to HR department under our grievance process.

What can be raised?

Our people are encouraged to raise any concerns or protected disclosures that they may have about the way our business is conducted at the earliest possible opportunity. Concerns can be about something that has already occurred or is likely to occur. Examples of concerns or protected disclosures:

- a criminal offence
- breaches in any legal duty
- miscarriage of justice
- unsafe actions or working conditions
- damage to the environment
- suspicions of fraud and wrongdoing
- a bullying culture
- concerns with regards to slavery/forced labour
- concealment of any type of wrongdoing

This is not an exhaustive list. This whistleblowing policy can be used in any instance where a concern is being raised.

How do I raise an issue?

- Stage 1 – First, raise your concerns with your VGC line manager for review.
- Stage 2 – If on conclusion of the stage 1 investigation, you are not satisfied with the outcome, you should elevate the matter to the Human Resources department for investigation. If you do not feel comfortable about raising the matter directly with your VGC line manager please email enq@vgcgroup.co.uk or use our confidential online reporting form at vgcgroup.co.uk/whistle. We will endeavour to address the matter within 28 days.
- Stage 3 - If on conclusion of the stage 2 investigation, you are not satisfied with the outcome, you should elevate the matter to the Director of Legal, Governance & Compliance via email to enq@vgcgroup.co.uk. They will conduct a further investigation. We will endeavour to address the matter within 28 days.
- Stage 4 - If after the completion of the stage 2 investigation you are not satisfied with the outcome you should report the matter to the appropriate statutory authority, or confidentially to CIRAS on 0800 4 101 101 or text 07507 285 887 or to Protect -Speak up, stop harm on 020 3117 2520.

At all stages in the process the company will ensure that adequate resources are available to investigate any concerns raised. Anyone raising a legitimate concern

or protected disclosure will not suffer any harassment, victimisation or disciplinary action in accordance with this policy. Furthermore, the company will protect the identity of the individual raising the concern as far as reasonably practicable.

Signed

Dated: 20 March 2026

A handwritten signature in black ink, appearing to be 'Ciara Pryce', written in a cursive style.

Ciara Pryce
Chief Executive Officer

This policy confirms the commitments of all members of the VGC Group.