

## Whistle Blowing Policy

### Policy Statement

The Beuparc Group ("Beuparc") is committed to doing business lawfully, ethically and with integrity, no matter who we deal with or where we operate. Beuparc promotes and supports a culture of honesty and openness.

We expect all staff to maintain high standards in accordance with our policies and procedures. However, all organisations face the risk that standards may be wilfully or negligently disregarded, or of unknowingly harbouring illegal or unethical conduct. Your action could prevent wrongdoing which could damage Beuparc's reputation or performance and could even save people from harm.

If you witness or suspect any wrongdoing at work, no matter how senior or in any area of our business, please report it. Your feedback could prevent wrongdoing which may damage Beuparc's reputation or performance and could even save people from harm.

Events presenting an immediate threat to life or property or that constitute an emergency should be reported to the appropriate emergency services.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers connected to work or the Beuparc business.

### How do I speak up about Something?

Beuparc shall establish reporting systems, both formal and informal, to support this policy.

You are encouraged to report your concerns to your line manager in the first instance. If your manager is involved in the improper behaviour, or you feel uncomfortable speaking to them about it, you should use an internal email [speakup@beuparc.ie](mailto:speakup@beuparc.ie), which comes through to the Legal & Governance Team.

If you do not feel comfortable reporting internally, Beuparc has established an independent, third-party reporting system. Information will be provided to Legal & Governance Team to assist with any investigation.

<https://speakupstarrus.integrityline.com/>

If you're considering reporting a matter it is your responsibility to ensure that any report is made in good faith and you have reason to believe that the allegation is true. When reporting a concern you're encouraged to provide as much information as possible, including names, dates, places, and details of the events that took place.

You may report a matter anonymously, but we would encourage you to go on the record, as your identity will be protected by our processes. Our ability to ask follow-up questions, investigate thoroughly and provide feedback may be limited if we cannot contact you. If you choose to remain anonymous your concerns will still be investigated as thoroughly as possible. You may request feedback through a telephone appointment or anonymised email address.

You can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken. If you raised a concern in good faith, which is not confirmed by subsequent investigation, no action will be taken.

The policy owner is the General Counsel / Company Secretary. If you have any questions about the policy please email [speakup@beuparc.ie](mailto:speakup@beuparc.ie)

To Whom does it apply?

It applies to all Beuparc employees operating in Republic of Ireland, United Kingdom and Holland as well as all third parties acting (or has acted) on behalf of Beuparc including, advisors, agency workers, contractors and other companies.

The [speakup@beuparc.ie](mailto:speakup@beuparc.ie) email and the <https://speakupstarrus.integrityline.com/> reporting line is available to all, within Beuparc and outside the company, who wish to raise a concern related to Beuparc's business activities.

What sort of things should be reported?

If you witness or suspect any wrongdoing at work, no matter how senior those concerned or in which area of our business, please report it.

We want you to speak up about any concern about wrongdoing that could affect Beuparc, its people, the communities and environment we work in.

Concerns related to harassment, bullying or personal grievances should be reported to your HR Business Partner. Refer to your local policies for further advice.

There are many examples of potential activities which may relate to actual or suspected wrongdoing or dangers connected to work and may include:

- Anything that is against the law
- Stealing or fraud
- Corrupt or dishonest activity
- Damage to the environment
- Quality or environmental issues which may lead to significant brand damage
- Covering up wrongdoing
- Abuse of authority
- Danger to health and safety
- Financial fraud or mismanagement
- Unauthorised disclosure of confidential information
- Breaches of Beuparc policies
- Unethical or immoral behaviour
- Deliberate concealment of any of the above

What will Beuparc do?

All disclosures will be treated with absolute confidence and your details will not be disclosed unless there is a legal obligation to do so. The Company Secretary will lead the investigation and your details will not be given to any others investigating the matter without your consent unless absolutely necessary.

You may be asked to attend meetings or agree to be contacted by telephone to talk through your concern further and get as much detail as possible.

Beuparc will abide by any local laws and regulations related to whistleblowing in the country where the concern is raised.

Beuparc is committed to treating all disclosures consistently and fairly and to ensuring that anyone raising a concern in good faith is protected from victimisation. Any instances of victimisation will be taken seriously and managed appropriately. If a person who has raised a concern in good faith is subsequently victimised, the perpetrator of the victimisation may be subject to internal disciplinary procedures.

Investigations will be carried out as quickly as possible but may take some time depending on the nature of the concern. If the investigation is prolonged, you will be kept up to date on what is happening.

The Beauparc Board will receive an anonymised summary of any concern reported and monitor management actions to resolve the matter.

You will be told the outcome of any investigation into your concern unless there is a legal reason why we can't share this with you. Due to the often-sensitive nature of a concern at work you may be told the outcome in confidence, which should not be shared.

If a breach of any Beauparc company policy or the law is uncovered, any employee or supplier who knew, or could reasonably be expected to have known of the breach, and didn't report it, may be subject to internal disciplinary procedures or other actions by regulatory bodies or the court.

The Company shall support the individual making the claim and will ensure that anonymity shall be maintained, wherever possible, if requested.

Reports shall be taken seriously and objectively investigated to discover the veracity of the claim. If the report is made in good faith, then the individual making the claim shall be protected from discrimination or penalty.

If, however, an employee or supplier makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Signed:



Chief Executive Officer

Date: 1st January 2025