



Group Whistleblowing Policy

1. Scope

This Policy applies worldwide to all individuals who have acquired information which is a Whistleblowing Concern (as defined in paragraph 3 below) in either a work-related context or due to their work connections, including as employees (permanent or temporary), officers and directors, consultants, contractors and employees of contractors or service providers, interns and trainees, former employees, job applicants, any persons working under the supervision and direction of Rubix's contractors, subcontractors and suppliers, agents, joint ventures, business partners and customs agents ("**Relevant Personnel**") acting for Rubix Limited and/or its subsidiaries (together, "**Rubix**").

2. Purpose

2.1 Through this Policy, Rubix aims to:

- (a) encourage reports of any form of suspected Whistleblowing Concern (as detailed in paragraph 3 below) as soon as possible;
- (b) provide guidance to Relevant Personnel as to how to raise their concerns; and
- (c) reassure Relevant Personnel that they are able to raise genuine concerns in the knowledge that they will be taken seriously without fear of discrimination or retaliation, even if they turn out to be mistaken, and that confidentiality will be respected.

3. Policy

3.1 Rubix is committed to the highest standards of openness, integrity and accountability and we expect all Rubix personnel to help maintain these standards in accordance with our [Code of Conduct](#) and other applicable policies, including but not limited to our [Gift and Hospitality Policy](#) and our [Anti-Bribery and Corruption Policy](#).

3.2 If any Relevant Personnel suspects any Whistleblowing Concern (as defined below), we encourage such person to raise a concern as soon as possible, and such person thereafter shall be a "**Whistleblower**". A Whistleblower may elect to remain anonymous, but Rubix encourages the Whistleblower to report on a named, confidential basis to aid any investigations.



3.3 A "**Whistleblowing Concern**" is any concern that any member of the Rubix Group or any of its personnel, partners or persons acting on its behalf engage in any illegal or unethical conduct, malpractice, dangers at work, or a breach of Rubix's [Code of Conduct](#) or other Rubix Group Policies, examples include:

- (a) failure to comply with Rubix internal policies, including but not limited to the Group's [Code of Conduct](#) and the [Anti-Bribery and Corruption Policy](#);
- (b) criminal activity;
- (c) financial and/or tax impropriety, fraud, theft, corruption or mismanagement, including facilitating tax evasion;

- (d) failure to comply with a legal, professional or regulatory obligation;
- (e) conducting business in a way that is a danger to the health and safety of people or the environment;
- (f) breach of competition laws (for example, by price fixing with competitors);
- (g) breach of privacy and data protection laws including the unauthorised disclosure of Rubix's or a third party's confidential information;
- (h) breach of IT networks and information systems, for example by way of cyber attack;
- (i) breach of product safety and compliance rules;
- (j) conduct that is likely to damage Rubix's reputation; and
- (k) the deliberate concealment of any of the above matters.

3.4 A disclosure of a Whistleblowing Concern by a Whistleblower is hereinafter referred to as an **"Alert"**.

3.5 If you are uncertain as to whether something is within the scope of this Policy, please speak to a member of the legal department or a member of your local compliance team.

3.6 This Policy is subject to any stricter local regulations or rights arising from each country in which Rubix is operating. In case of a conflict or inconsistency between this Policy and local country laws or regulations, the local country laws shall apply.

4. Protection of Whistleblowers

Confidentiality

4.1 Rubix recognises that the decision to speak up can be difficult. Rubix shall make every effort to ensure that the identity of the Whistleblower is not disclosed to anyone beyond the relevant persons in charge of investigating the Alert, without the explicit consent of the Whistleblower. This shall also apply to any other information from which the identity of the Whistleblower may be directly or indirectly deduced.



4.2 Please note that the identity of the Whistleblower may be disclosed if this is required by law, for example during investigations by national authorities or during judicial proceedings.

Data Protection

4.3 Any processing of personal data carried out pursuant to this Policy shall be carried out in accordance with applicable law. Personal data which is manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

4.4 Reports shall be stored for no longer than is necessary in order to comply with applicable law.

No retaliation against Whistleblowers

- 4.5** Rubix understands that Whistleblowers may be worried about possible repercussions. We want to encourage openness and will support Relevant Personnel who raise Alerts under this Policy, even if they turn out to be mistaken. We will not tolerate any retaliation or victimisation and will take appropriate action to protect any person who raises an Alert in good faith, including any necessary disciplinary action against anyone retaliating or victimising a Whistleblower due to their report. If you believe that you have suffered any such treatment, you should inform your line manager, senior management, the local compliance team or the Group General Counsel immediately.
- 4.6** 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 raise an Alert

Internally via Rubix Network

- 5.1** Rubix encourages you to first consider whether you are able to raise a Whistleblowing Concern with your line manager; the CEO of the relevant Rubix region; the HR department; the legal department; the Group General Counsel; or your local compliance team. You could do this by speaking to them or emailing them and they may be able to resolve the issue quickly and effectively.

Externally via Safecall

- 5.2** Rubix appreciates that you may not always feel comfortable raising Whistleblowing Concerns internally. For this reason, Rubix has established an independent confidential reporting system in partnership with Safecall, which allows you to raise Whistleblowing Concerns independently. This service is available in all languages in the countries in which Rubix operates. Safecall will document your disclosure and relay the information for Rubix to investigate. If you wish to raise a Whistleblowing Concern with Safecall you can do this by:



(a) filing a report online using this link: [Safecall - File a Report](#); or

(b) calling the local Safecall Whistleblowing hotline number which should be displayed at all Rubix sites (available in all countries in which Rubix operates) and is available using this link: [Safecall - Telephone Numbers](#)

- 5.3** Please see Appendix 1 and 2 for further information relating to the reporting process, types of information you will be required to disclose when reporting a Whistleblowing Concern and the investigation process.

Externally via third parties/publicly

- 5.4** This Policy provides 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. However, Whistleblowing Concerns can also be disclosed under applicable local law through independent and autonomous external channels established by local and/or European Union authorities.
- 5.5** We strongly encourage any Whistleblower to seek advice before any public disclosure. If you do decide to disclose the matter publicly, you can only qualify for legal protection in certain circumstances and if you fulfil certain conditions prescribed by local laws.
- 5.6** Whistleblowing Concerns usually relate to the conduct of Rubix personnel but may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances, the law will protect a person if they raise the matter with the third party directly. However, we encourage Rubix personnel to report such concerns internally first, in line with this Policy. You should contact a member of your local compliance team or the legal department for further guidance.

6. Updates

This Policy may be updated from time to time. Any updated version of this Policy will be communicated to the CEO of each region and made available on the Rubix intranet.

For Rubix employees, please note that this Policy does not form part of the terms of your employment with Rubix which are provided to you separately.

7. Contacts

Please contact a member of your local legal department or local compliance team (compliance@rubix.com) if you have any questions relating to the content of this Policy.

8. Version control

Version	Author	Approver	Date
v.1.0		Group HR Director	1 October 2019
v.2.0	Group legal department	Group General Counsel	6 June 2022
v.3.0	Group legal department	Group General Counsel	15 November 2024
v.4.0	Group legal department	Group General Counsel	17 March 2026

Appendix 1: Safecall report process

- 1.1 Safecall's confidential Call Centre is open 24 hours per day, seven days a week and 365 days a year and offers Whistleblowers the opportunity to speak to someone in their local language: [Safecall - Telephone Numbers](#)
- 1.2 Alternatively, individuals can log a report online using this link: [Safecall - File a Report](#)
- 1.3 Safecall's role is to primarily take a report and submit it to relevant Rubix personnel responsible for managing Alerts (being the head of internal audit and Group General Counsel if the caller elects to report at Group level) within 24 hours of the conclusion of a call. At the Whistleblower's option, the report may be submitted locally or at Group level. The report will detail the time, date and nature of the Alert together with details of the allegations.
- 1.4 When a person calls any of the Safecall numbers from outside the UK they will be given language options based on their location. The caller will hear a short pre-recorded introduction in the local language before being connected to a Safecall operator and an interpreter. The call process then follows the structure below:
 - The person contacting Safecall will be asked to identify who they work for. This helps set the scene that the number they are calling is not part of their organisation's internal system operating under a different name;
 - Calls are handled by skilled operators and will be treated in complete confidence;
 - The operator will explain to the caller who Safecall is, its role and the procedures to be undertaken;
 - Safecall will pass all information to Rubix, at the caller's choice, the local concerned Rubix company level or at the Group level;
 - Safecall takes hand written notes of the concern;
 - The conversation is not audio recorded;
 - Safecall produces a written report;
 - The recipients of the report within Rubix will depend on the caller's choice to submit the report locally or to the Group;
 - When the report will be sent.
- 1.5 The caller is asked to provide two passwords and they are provided with a unique Personal Identification Number (PIN). The passwords and the PIN number are used during any future communication between Safecall and the caller to maintain security between them.
 - The caller is then asked for:
 - Their name
 - Contact details
 - Their position within the organisation
 - Where exactly they work (which factory, department etc.)
 - How they became aware of Safecall (poster, intranet etc.)
 - If the caller wishes to report a matter anonymously, Safecall will comply with their request so far as legally possible. The operator will explain why they are asking certain questions. Safecall will guarantee the caller's anonymity and will send the report as directed by the caller.
 - All callers are encouraged to keep in touch with Safecall and arrangements are made for future contact within an appropriate timeframe. The time of future contact may vary due to the nature or seriousness of the call and enables us to provide any appropriate

feedback or ask further questions of the caller. This is extremely important with anonymous callers and enables Safecall to build up trust as well as making them available for Rubix requested questions or further developments.

- Callers can log onto Safecall's website and by using the first password they gave to Safecall and the PIN Safecall supplied them with, they will be able to log into a secure portal where they will be able to access any updates Rubix has sent to Safecall in connection with the Alert. They will also be able to leave any comments, feedback or answers to any questions that Rubix has asked. If they do leave any further information on the site, Safecall will get a notification and will send the information onto the companies chosen contacts.
- Once the caller has finished reporting their concern, Safecall's operator using its hand-written note, writes up a report. This report is then passed to an operations manager who will check the report and will then send the report to the contact persons (investigating officers) within the concerned Rubix company or the Group.

Appendix 2: Investigation of Alerts

1.1 Initial Process

If an Alert has been raised, Rubix will first check the credibility of the Whistleblowing Concern.

If the Whistleblower has provided some means of contact (for example, they made the Alert through Safecall), then the Whistleblower will receive an acknowledgement of receipt within 7 days of first making the Alert.

The Whistleblower may choose whether the Alert should be investigated locally by the Rubix company to which the Alert relates or at Rubix Group level. However, Rubix may override this request if there is no justification for the request.

Alerts containing sufficiently detailed information or documentation shall be diligently investigated by Rubix.

If the Alert is raised orally via Safecall's call centre, the Whistleblower shall be given the opportunity to check, rectify and agree the written report of the call before it is passed on to Rubix.

1.2 Notification to Whistleblower

If an investigation is deemed necessary, the Whistleblower will be notified (subject to them providing a means of being contacted). If not, the Whistleblower will receive an explanation as to why an investigation is not deemed necessary.

1.3 Launching of internal investigation

If disclosure of the Whistleblowing Concern falls within the scope of this Policy and if it is decided that sufficient information has been provided, an internal investigation will commence. The investigation will be conducted either by the relevant local Rubix company or by Rubix Group (as applicable and depending on whether the Whistleblower expressed a preference as to who should investigate).

The relevant Rubix personnel responsible for managing Alerts (being the head of internal audit and Group General Counsel if the caller elects to report at Group level) will designate an impartial and competent person or group of individuals to investigate the Whistleblowing Concern/Alert. This may be the same person or group of people who receives the Alert. The person in charge of the investigation will maintain communication with the Whistleblower and, where necessary, ask for further information from, and provide feedback to, the Whistleblower.

The person(s) named in the Alert shall be informed as soon as possible after Rubix has taken all appropriate preventive measures (i.e. ensured maintenance of evidence).

Investigations may include face-to-face interviews with the Whistleblower, questionnaires, interviews with witnesses (either in person or over the telephone or video) and obtaining legal advice.

1.4 Use of third parties to conduct investigation

Sometimes, particularly complex, urgent and/or sensitive Alerts may be dealt with by an independent external third party who is skilled in the matter requiring investigation.

1.5 Timelines for investigation

The person in charge of the investigation will ensure that the investigation is undertaken as quickly as possible without prejudicing the investigation.

The Whistleblower will receive feedback as to the progress of an investigation within a reasonable timeframe, not exceeding three months from the acknowledgment of receipt of the Alert or, if no acknowledgement was sent to the Whistleblower, three months from the expiry of the seven-day period after the Alert was made.

The local compliance team may be involved in order to determine whether recommendations or corrective actions are necessary. Corrective actions may consist of disciplinary measures or judicial procedures depending on local/national laws and regulations.

1.6 End of investigation

On completion of an investigation, the Whistleblower will be written to by the person in charge of the investigation (where the Alert has not been anonymous), setting out the outcome of the Alert and any remedial action.

1.7 Dissatisfaction with outcome

Whilst Rubix cannot always guarantee the outcome the Whistleblower is seeking, Rubix will try to deal with concerns fairly and appropriately. By following this Policy, the Whistleblower can help us achieve this.

However, if the Whistleblower is not happy with the way in which the Alert has been handled, the Whistleblower may raise such concerns with a member of the local compliance team, the Group General Counsel or the CEO of the relevant Rubix region.