

## Whistleblowing Policy

### Introduction

At Worldwide International Ltd t/a Publiship, we are committed to conducting our business with honesty, integrity, and transparency. To maintain this high standard, it is essential that any malpractice, unethical behaviour or illegal activities within the organization are promptly reported. This Whistleblowing Policy encourages employees and other stakeholders to raise concerns in good faith, without fear of retaliation or negative consequences.

This policy applies to all employees, contractors, consultants, and any other individuals working on behalf of the company.

### Purpose

The purpose of this policy is to:

- Encourage employees and others to raise concerns about wrongdoing or unethical conduct.
- Provide a safe and confidential way to report concerns.
- Ensure that reports are handled in a timely and appropriate manner.
- Protect whistleblowers from retaliation or victimization.

### Scope of the Policy

This policy covers concerns that may include, but are not limited to:

- Criminal activity: such as fraud, theft, or embezzlement.
- Breach of legal obligations: including non-compliance with health and safety regulations or labor laws.
- Misuse of company resources: including financial mismanagement or improper use of company assets.
- Unethical conduct: such as bribery, corruption, discrimination, or harassment.
- Environmental harm: any actions that pose a threat to the environment.
- Dangerous practices: actions that could jeopardize the safety or health of employees or others.

Personal grievances or complaints related to individual employment matters should be addressed through the company's grievance procedure, not through the whistleblowing process.

### Reporting a Concern

If you become aware of any wrongdoing, you are encouraged to report it as soon as possible.

There are several ways to raise concerns:

- Immediate Supervisor: In most cases, you should first report the concern to your immediate supervisor or manager.
- Other Manager: If you are uncomfortable reporting to your supervisor, or if the concern involves them, you can report directly to another Manager.
- Company Director

All reports will be treated with confidentiality, and every effort will be made to protect the identity of the whistleblower, except where disclosure is required by law.

### **Investigation Process**

Once a report is received, it will be assessed and investigated thoroughly and impartially. The process is as follows:

1. **Acknowledgment:** The whistleblower will receive confirmation that the report has been received (if the report is not anonymous).
2. **Initial Assessment:** The Whistleblowing Officer will conduct an initial review of the concern to determine if further investigation is warranted.
3. **Investigation:** A formal investigation will be conducted if necessary. This may involve interviewing relevant parties, gathering evidence, and consulting with legal or external advisors.
4. **Outcome:** The whistleblower will be informed of the investigation's outcome (if applicable), and corrective actions will be taken where required.

### **Protection for Whistleblowers**

Worldwide International Ltd t/a Publiship is committed to ensuring that no one suffers any form of retaliation for reporting a concern in good faith. This means:

- You will not face any adverse treatment, including dismissal, demotion, harassment, or discrimination, as a result of raising a genuine concern.
- Any form of retaliation against a whistleblower will be treated as a serious disciplinary matter, and appropriate action will be taken against those responsible.

If a whistleblower feels they have faced retaliation, they should report this immediately to a Company Director

### **False Claims**

Whilst we encourage the reporting of genuine concerns, malicious or knowingly false allegations will not be tolerated. Individuals making such claims may be subject to disciplinary action.

### **Confidentiality and Anonymity**

We aim to handle all reports confidentially. However, there may be situations where confidentiality cannot be maintained (e.g., when a formal investigation leads to legal proceedings). In such cases, the whistleblower will be informed prior to disclosure.

For those wishing to remain anonymous, the company will respect anonymity to the extent possible, though this may limit the investigation process.

### **Review and Amendments**

This Whistleblowing Policy will be reviewed annually to ensure it remains relevant and effective. Worldwide International Ltd t/a Publiship reserves the right to amend or modify this policy as needed in response to legal changes or operational requirements.

### **Conclusion**

Worldwide International Ltd t/a Publiship is committed to maintaining the highest standards of ethical conduct and encourages all employees to report any wrongdoing without fear. By following this policy, we can ensure a transparent, accountable, and fair working environment for all.

**Acknowledgment:**

All employees are required to acknowledge receipt and understanding of this policy.

Worldwide International Ltd T/A Publiship is committed to conducting business ethically and with integrity.

This policy will be reviewed annually or sooner if required due to changes in legislation or business needs. Any amendments will be communicated to employees in a timely manner.

Prepared by: Mark Bartlett | ESG Manager

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Approved by: Sue Kelly | Operations Director