

## Whistleblowing Policy

The Elis Whistleblowing Policy encourages employees to raise concerns about any malpractice or wrongdoing within the business.

The policy explains the whistleblowing system and provides the reporting tool which can be used openly or anonymously to report any actual or suspected, bribery and corruption, fraud or other wrongdoing.

All reports are made to an external support service and should be used when an employee would like to remain anonymous, or if the standard escalation through line management would be inappropriate.

### WHISTLEBLOWING PROCEDURE

In order to ensure the effectiveness of the principles and values specified in this Code, Elis encourages transparency. Any employee confronted with a situation likely to breach a law, a regulation or the principles laid down in this Code of ethics may freely report the situation to his/her manager, to any other senior manager, to the compliance manager (compliance officer) also known as the system's «referring officer», or to his/her human resources manager. Elis also provides employees with an alert system, enabling them to confidentially report any situation of this type that they may be personally aware of, or to obtain help and advice relative to the content of the present Code and its implementation procedures. The alert system is available at the following address:

<https://report.whistleb.com/elis>

No penalty or discriminatory measures will be taken against any employee who uses this alert system in good faith and without intention to cause harm. Elis guarantees the confidentiality of the identity of the person raising the alert, the reported facts and the persons mentioned by the report. The disclosure of facts may be reported only through strict compliance with applicable regulations, notably concerning reporting procedures and their proportionate character in safeguarding the interests in question.

Signed: \_\_\_\_\_



Joanne Darcy  
CEO Elis Ireland

Date: 18<sup>th</sup> July 2023