



Whistleblowing and Grievances Policy



Whistleblowing and grievances

What is whistleblowing?

Whistleblowing is the act of disclosing information about a wrongdoing or illegal activity within an organization, typically by an employee or insider who has access to such information. The person who exposes the information is known as a whistleblower.

It is impossible to give an exhaustive list of activities that when reported would constitute whistleblowing, but broadly speaking, including but not limited to, acting in the following ways would fall under this category:

- dishonesty, fraud (esp. fraudulent accounting matters) or corruption (including offering or accepting bribes)
- illegal acts (including theft, violence or threatened violence and criminal damage against property)
- someone's health and safety is in danger
- breaching of any legal or regulatory obligations
- unethical behaviour
- risk or actual damage to the environment
- covering up of wrongdoing
- or other improper conduct

Reports of personal grievances such as discrimination, bullying, or harassment, are not covered under whistleblowing unless in the public interest. However, we take reports of such incidents very seriously, and these therefore can be made through either the local HR team or the same channels as whistleblowing and will be dealt with in a similar manner.

Purpose

Whilst we seek to prevent all instances of misconduct such as illegal activities, policy violations, or discrimination, we recognise that like any company, there is a risk of these activities occurring. This policy intends to ensure a robust whistleblower and grievance process is in place, so that these incidents are reported without fear of retaliation and dealt with accordingly. This is a critical part of building trust from our stakeholders that our policies are being implemented and followed.

This policy will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with relevant laws and regulations.

Reporting Mechanisms

If any employee or external stakeholder reasonably suspects that unacceptable or illegal conduct has occurred or will occur, they should report this as soon as they become aware of it.

There are two internal reporting channels available

Direct reporting

Employees may report concerns to their immediate manager. If due to the circumstances it is not possible to advise the manager, the employee must disclose his/her suspicions to the local MD, or if

that is also not possible, the CEO. For HR-related matters, reports can also be made to the local HR team.

Reporting through 3rd party channel

Employees or external stakeholders may report concerns through our 3rd party channel, Whistleblower Software ApS, available at <https://whistleblowersoftware.com/secure/Constellation>.

This channel allows the following two types of reporting:

- **Confidential reporting** with inclusion of name and contact information. The report is treated confidentially, and the whistleblower's identity is only known to those who handle the case
- **Anonymous reporting**, where absolutely nobody receives any details of who reported the incident.

Reports can be submitted in either written or spoken format. For anonymous spoken reports, distortion of the whistleblower's voice to anonymise it is possible through the system.

The case investigators will be displayed to the whistleblower before submitting the report, and so any investigator for which the case is relating to or there is a conflict of interest should be deselected by the whistleblower.

The system also allows you to follow up on the status of your reports and further communication with the investigation team. It is important to check the system regularly using the unique password provided if the case was submitted anonymously. For anonymous cases, if the password is lost, access to the case is not recoverable and you must submit a new case.

Investigation and closure

All reports will be thoroughly and promptly investigated according to the timelines outlined in the EU Whistleblowing Directive or relevant national legislation. Reports will be treated sensitively and confidentially throughout the investigation process.

Constellation will not expect absolute proof of the alleged misconduct, however the reporter will need to be able to show the reason for their concern. External specialists or law enforcement may be consulted to assist with the investigation where necessary. Reports made in bad faith will be treated as misconduct and dealt with appropriately.

Grievances will be dealt with fairly and consistently and investigated to get as much information as reasonably possible. All parties should be given a chance to have a say before a decision is made where possible. An employee has the right to bring another person with them to a grievance meeting.

Following an investigation, if an employee is found to have committed and/or supported unacceptable conduct, the appropriate course of disciplinary action will be considered.

If it is decided there is not sufficient evidence of unacceptable conduct, Constellation will ensure that the reporter is informed of the decision and the reasons thereof. Actions should be taken and a decision made on the outcome of the case as soon as reasonably possible.

The person submitting the report will be informed of the progress and outcome of the investigation, to the extent permitted by law.

The company will maintain records of all reports and investigations in a secure and confidential manner, consistent with applicable laws and regulations.

Protecting confidentiality

Constellation is committed to maintaining the confidentiality of individuals that disclose unacceptable conduct under this policy, no matter which channel they report through.

The case investigator will not disclose the individual's identity unless:

- the individual consents to the disclosure;
- the disclosure is required by law;
- the disclosure is necessary to prevent or lessen a serious threat to a person's health or safety; or
- the disclosure is necessary to protect or enforce a Constellation group company's legal rights and interests or to defend any claims.

Constellation will also ensure that any records relating to a report of unacceptable conduct are stored securely and can only be accessed by authorised employees.

The Whistleblower Software 3rd party whistleblowing system allows for fully secure and anonymous reporting. This includes through the use of:

- Secure end-to-end encryption
- Voice distortion and anonymisation for reports that are provided via voice recording
- Removal of metadata from all attachments

Other protections for whistleblowers

An employee who discloses conduct that they reasonably believe to be unacceptable conduct will not be personally disadvantaged as a result of having made the disclosure. Any form of retaliation against individuals who, in good faith, report concerns will not be tolerated. Retaliation is a serious violation of this policy and may result in disciplinary action, up to and including termination. If an employee feels that they are experiencing retaliation, they should report this to the whistleblowing / grievance investigator or to their local MD.

If an employee is not satisfied with the outcome of a grievance investigation and believes that the outcome is incorrect or unfair, or that there is new evidence to consider, they can make an appeal in writing to the CEO. The CEO will hear the appeal, carry out another investigation if appropriate, and provide the final outcome in writing as soon as possible.