WHISTLEBLOWING POLICY

Amtico is committed to the highest possible standards of openness and accountability in the manufacture and delivery of its goods and services. Despite this, disclosures about impropriety or malpractice may arise.

Amtico is committed to tackling the issue and will not tolerate any such malpractice, abuse or wrongdoing, so invites members of the public, suppliers and customers who may wish to make a disclosure about what is happening in relation to any activity in Amtico or its supply chain to come forward and voice these concerns. Any suspected wrongdoing should be reported as soon as possible.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities, including concerns arising within our supply chain or involving customers, suppliers, contractors or other third parties. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. Disclosures in relation to sexual harassment, harassment or victimisation, including conduct involving customers, suppliers, contractors or other third parties, can also be reported under this policy.

This policy should be read in conjunction with:

- Grievance Procedure
- Dignity at Work Policy
- Preventing Sexual Harassment Policy
- Equal Opportunities Policy
- Human Rights Policy Statement
- Freedom of Association and Collective Bargaining Policy
- Modern Slavery & Human Trafficking Statement
- Child Labour, Remediation & Young Workers Policy

1.0 Internal disclosures

We hope in many cases that employees and any internal staff will be able to raise any concerns internally, if you are Amtico staff, please see our Speaking Up policy for details on how to raise concerns internally.

2.0 External disclosures:

Nothing in this policy prevents a person from making a protected disclosure to an appropriate prescribed person or regulatory body where permitted by law.
Amtico understands that, on occasion, it may be difficult for those aware of malpractice or wrongdoing to bring it directly to Amtico's attention. To overcome these potentially difficult circumstances, and to protect individuals or organisations wishing to raise concerns, Amtico has joined NAVEX. This is an anonymous, free to call and confidential service to enable you to report any concerns (including any concerns about sexual harassment in relation to yourself or others).

Anonymous disclosures will be considered and assessed on their merits, although the ability to investigate and provide feedback may be limited where the identity of the reporter is unknown and ability to obtain additional information is limited.

NAVEX is a completely independent organisation with impartial staff to handle these types of calls. You can phone in total confidence knowing that your call will not be traced or recorded. The information you give NAVEX will be passed onto Amtico's HR Director or Finance Director without compromising you in any way. There is no charge; NAVEX gives you a unique code number to make it easy for you to phone back with information if you wish.

You can contact NAVEX, free from any phone, 7 days, 24 hours, just dial 0800 086 9260 or access via the web on amtico.ethicspoint.com.

3.0 If you witness sexual harassment or victimisation:

Staff who witness sexual harassment or victimisation are encouraged to take appropriate steps to address it.

Depending on the circumstances, this could include:

a) Intervening where you feel able to do so.
b) Supporting the victim to report it or reporting it on their behalf.
c) Reporting the incident (under this policy or under the Speaking Up policy) where you feel there may be a continuing risk if you do not report it.
d) Co-operating in any investigation into the incident.

4.0 Feedback to Whistleblowers

Where appropriate and lawful to do so, Amtico will provide feedback on the outcome of concerns raised, whilst maintaining confidentiality and data protection obligations.

5.0 Protection for whistleblowers:

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the HR Team immediately.

You must not threaten or retaliate against whistleblowers in any way. Retaliation may include dismissal, disciplinary action, intimidation, harassment, exclusion, denial of opportunities, detrimental changes to duties or any other unfavourable treatment associated with raising a genuine concern.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action or (in the case of external parties) such other action as may be deemed necessary.

6.0 Equity Impact Assessment and Monitoring

Equality Principles
Amtico is committed to ensuring this policy is applied fairly, consistently and without discrimination.
This policy supports the principles of the Equality Act 2010 and promotes openness, accountability, worker voice and protection from retaliation.

Individuals Potentially Affected
Particular consideration should be given to:

- Employees with disabilities
- Agency workers and contractors
- Migrant workers
- Apprentices and young workers
- Employees from ethnic minority groups
- Women
- LGBTQ+ employees
- Individuals in vulnerable or less secure roles

Amtico recognises that some groups may face barriers to reporting concerns and will seek to remove or reduce those barriers.

Accessibility and Inclusive Reporting
Amtico will seek to ensure reporting mechanisms are accessible.
Where appropriate the Company will:

- Provide reasonable adjustments.
- Consider alternative formats and communication methods.
- Provide suitable meeting arrangements.
- Support individuals who require assistance to raise concerns.

Monitoring and Oversight
The HR Director will monitor:

- Whistleblowing disclosures.
- Trends and themes arising from reports.
- Retaliation concerns.
- Audit findings.
- Feedback regarding reporting routes.

Monitoring will seek to identify barriers and opportunities for improvement.

Continuous Improvement
Where monitoring identifies issues or barriers, Amtico may implement:

- Additional awareness campaigns.
- Policy updates.
- Further training.
- Improvements to reporting mechanisms