

# Whistleblowing Policy

## Policy Statement

At Bytes Software Services Limited ("Bytes") we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with our employees, customers, partners, suppliers, shareholders, and other stakeholders. Bytes is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

## Purpose

This policy has been implemented to raise awareness and safeguard any concerns raised regarding misconduct or improper behaviour or circumstances in relation to any business managed by Bytes is dealt effectively, securely, appropriately in accordance with the Corporations Act 2001.

This policy is to provide an internal mechanism for reporting, investigating, and remediating any wrongdoing in the workplace.

Bytes encourages all staff to report any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable conduct involving Bytes business in good faith. Bytes has a responsibility to provide protection and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal nor will they suffer any detrimental treatment because of the disclosure.

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as staff in this policy).

This policy should not be used for complaints relating to your personal circumstances, you must follow Bytes Grievance Procedure.

If there is any uncertainty whether something is within the scope of this policy, you should seek advice from Bytes Whistleblowing Officer.

## Who is responsible?

The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure managers and staff who may deal with the concerns or investigations receive regular and appropriate training. Policy review must be held annually at a minimum in conjunction with the Board.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the Whistleblowing Officer.

## Definitions

<b>Whistleblowing</b>	Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include criminal activity; miscarriages of justice; danger to health and safety; damage to the environment; failure to comply with any legal obligation; bribery; negligence; breach of our internal policies and procedures; or the deliberate concealment of any of these matters.
<b>Whistleblower</b>	A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or negligence affecting any of our activities, you should report it under this policy.
<b>External Investigator</b>	They are Individual or a team of specialist with relevant experience of investigations or specialist knowledge. The investigator(s) provides an independent view that may make recommendations for change to minimise the risk of future wrongdoing
<b>Detrimental Conduct</b>	Detrimental Conduct includes actual or threatened conduct such as the following (without limitation): <b><i>Termination of employment; Injury to employment including demotion, disciplinary action; Alternation of position or duties; Discrimination; Harassment, bullying or intimidation; Victimisation; Harm or injury including psychological harm; Damage to a person's property; Damage to a person's reputation; Damage to a person's business or financial position; or Any other damage to a person.</i></b>

## Reporting Your Concern

Bytes trusts our employees in maintaining a culture of honest and ethical behaviour. Accordingly, if you become aware of any concerns that may or will affect the business, it is expected that you will need to disclosure the issue under this policy.

You will be able to raise a concern with your line manager or the HR Team in person or writing as your first point of contact. At this stage they may be able to decide a way of resolving the matter effectively. However, in some cases, they may refer the matter to the Whistleblowing Officer.

Where an issue is more serious, or you feel that your line manager or the HR Team department have not addressed your concern, or you prefer not to raise it with them for any reason, you should contact:

Whistleblowing Officer

Tina Sexton  
[Whistleblow@bytes.co.uk](mailto:Whistleblow@bytes.co.uk)

Where a concern is raised in good faith, and the investigation establishes that there is a genuine and innocent explanation, then Bytes will consider your concern to be concluded. The fact of having raised the concern will not reflect badly on the member of staff.

### Confidentiality & Integrity

Bytes has an open channel of communication, and we hope that our staff feels comfortable to raise a whistleblowing concern openly under this policy. Bytes has a duty of care to protect the information provided and your identity. When investigating and there is a requirement for your identity needs to be known before any information is exchanged Bytes will ensure to speak to you before proceeding.

When making a disclosure, you may do so anonymously. It may be difficult for Bytes to properly investigate if a report you submitted anonymously and therefore, we do encourage staff to make disclosures openly, however you are not required to do so. If you are concerned about possible reprisals, you should raise this with our Whistleblowing Officer. We can assure you that Bytes have measures in place to preserve your identity and confidentiality of the matter.

If you are in any doubt, you can seek advice from an independent whistleblowing charity Protect.

**Helpline:** 020 3117 2520  
**E-mail:** [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)  
**Website:** [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

### External Disclosures

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or on rare occasions alerting the media.

If you do not feel comfortable reporting your concern internally, Bytes strongly encourage you to seek advice before reporting a concern externally.

Protect operates a confidential helpline that will provide clear and appropriate advice on what and how to raise your concerns.

Whistleblowing concerns usually relate to the conduct of our staff, nevertheless concern could relate to a third party, such as a customer or supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first.

### Investigation

Bytes will investigate in accordance with this policy as soon as practicable after you have reported the matter. Our Whistleblower Officer will investigate and where necessary, appoint an external investigator to assist in conducting the investigation. All investigations will be conducted in a fair, independent, and timely manner and all reasonable efforts will be made to preserve confidentiality during the investigation.

If the report is not anonymous, the Whistleblower Officer or external investigator will contact you, by your preferred method of communication to discuss the investigation process and any other matters that are

relevant to the investigation.

Bytes will arrange a meeting with you as soon as possible to discuss the concern. You may bring a representative such as a work colleague or a union member to any meetings under this policy. It is important that your representative that you have chosen respects the integrity and confidentiality of the matter and any subsequent investigation.

Where you have chosen to remain anonymous, your identity will not be disclosed to the investigator or to any other person and Bytes will conduct the investigation based on the information provided.

Bytes will conduct an assessment to determine the scope of any investigation following the meeting.

Bytes will inform you of the outcome of the investigation. You may be required to attend additional meetings to provide further information.

Bytes will aim to keep you informed of the progress of the investigation and any timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

Where Bytes regards that the member of staff that raised the concern under this procedure maliciously, or without having any reasonable grounds for doing so, action may be taken against the individual of staff under the disciplinary procedure. In extreme cases, this could result in dismissal.

### Investigation Outcome

While we cannot always guarantee the outcome that you are seeking, Bytes will try to handle your concern fairly and in an appropriate way. However, if you are not happy with the way Bytes handled and result of the investigation, you can raise your concerns directly to the Whistleblower Officer or external investigator.

### Protection

#### **(1) Whistleblowers**

Bytes is committed to ensuring that any person who makes a disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters under this policy.

#### **(2) Legal**

You will not be subject to any civil, criminal, or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.

Any information you provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

#### **(3) Detrimental Conduct**

Bytes will not engage in 'Detrimental Conduct' against you if you have made a disclosure under this policy as defined above.

Bytes will ensure that no forms of Detrimental Conduct against any person who is involved in an investigation

complies with this policy and legislation.

Bytes will take all reasonable steps to protect you from Detrimental Conduct and will take necessary action where suitable by:

- Allowing you to perform your duties from another location;
- Reassigning you to another role (at the same level);
- Making other modifications to your workplace or your duties to protect you from the risk of detriment;

If you subjected and suffered from such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

#### **(4) Confidentiality**

All information received will be treated confidentially, sensitively and protected under this policy whether you have reported the concern openly or anonymously.

If you make a disclosure under this policy, your identity and or information which would likely to identify you will only be shared if:

- You give your consent to share that information; or
- The disclosure is allowed or required by law; or
- The concern is reported to regulatory or government body

Where it is necessary to disclose information for the effective investigation it is likely to lead to your identification. However, Bytes will take reasonable steps to reduce the risk of your identity being exposed. For example,

- All personal information or reference to you witnessing an event will be redacted from any report and anonymised where possible.
- You will be contacted to help identify certain aspects of your disclosure that could inadvertently identify you.
- Any disclosure under this policy will also be handled and investigated by qualified staff.

Bytes measures for protecting your identity will be complying with Data Protection Act and GDPR Regulations.

#### **Other Matters**

If you wish to escalate your concerns against Bytes, please seek advice from Protect-Advice and report your concerns to Bytes Technology Group:

*Chair of the board of directors*

Patrick De Smedt

Per:

WK Groenewald (Group Company Secretary)

[WK.Groenewald@Bytes.co.uk](mailto:WK.Groenewald@Bytes.co.uk)



Any breach of this policy will be taken seriously and may result in further action taken by Bytes, this may lead up to and including termination of employment.

Employees are encouraged to read this policy in conjunction with other relevant Bytes and Group policies and documents:

- Bytes Code of Conduct
- Bytes Grievance Policy
- QMF 05 Staff Handbook
- [BTG Whistleblowing Policy](#)

Signed on Behalf of Bytes Software Services Limited:

**Signature:**   
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**Name:** Tina Sexton

**Position:** Financial Director (Whistleblowing Officer)

**Date:** 25/05/2024