

Whistleblowing Policy

Policy brief & purpose

The aim of our Whistleblowing Policy is to encourage employees and others who have serious concerns about any aspect of the NextWave's operations to come forward and voice those concerns without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

Control

| Version | Created Date | Approved Date | Approved By | Description |
|---------|-----------------------------|-----------------------------|-----------------|--------------------------------|
| 1.0 | 21 st March 2022 | 31 st March 2022 | Tony Clark, CEO | Baseline version |
| 1.0 | | 22 nd March 2023 | Tony Clark, CEO | No changes |
| 2.0 | 9 th June 2023 | 15 th June 2023 | Tony Clark, CEO | Updated types of concerns list |
| | | | | |

This policy is reviewed and signed off annually at a maximum.

Scope

This policy applies to our company and its subsidiaries. It may also refer to suppliers and partners.

Overview

This policy outlines what you should do if you suspect something happening at work is putting you or others in danger, or is illegal or unethical.

This policy applies to the following Nextwave Consulting LTD (Nextwave) individuals:

- Employees
- Self-employed contractors
- Consultants
- Interns
- Agency workers

Any reference to another policy within this one does not infer that it applies to the same group of individuals. Please ensure you read the policies and who they apply to, in the overview section first.

If you are an employee, this policy does not form part of your contract of employment and we reserve the right to amend this policy from time to time.

What is whistleblowing?

Our aim is to maintain the highest standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have any such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’. You can be assured that we will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.

The types of concerns you may want to raise with us by whistleblowing might include:

- any activity you suspect is criminal or fraudulent;
- any activity you suspect puts health and safety at risk;
- any activity you suspect may damage the environment;
- any activity you suspect breaches our policy on bribery and corruption;
- any failure to comply with legal or regulatory obligations;
- any activity you suspect breaches our policy on information security;
- any failure to meet professional requirements; and/or
- any attempt to conceal one or more of these activities.

Speak to the Nextwave HR Department you are not sure whether something you have become aware of is covered by this policy. Note that if your complaint is about the way people are behaving towards you, then you should refer to our policy on Bullying and Harassment, or to our Grievance Policy, for guidance on how to proceed.

How to raise a whistleblowing concern

In most cases, you should start by raising your concerns with your Nextwave Line manager, either face-to-face or in writing.

If you would prefer not to go to your Nextwave Line manager, you should write to Nextwave's HR Department. You should also do this if your concerns are of a very serious nature.

Your formal written communication should have an audit trail and it should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.

You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.

You will be kept informed about how our investigations are progressing and how long they are likely to take. Sometimes, however, we may be unable to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations.

Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of our board directors for further consideration.

Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our Disciplinary Policy and is at risk of being dismissed for gross misconduct.

Confidentiality and anonymity

There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.

You are always encouraged to raise concerns openly, and if you prefer to do so in confidence, we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.

You are protected from reprisals under this policy (see paragraph 5), but if you are still worried we encourage you to discuss this with us and we will explore how far we can go in keeping your concerns confidential.

Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether your allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

How we protect whistleblowers

If you raise a concern in good faith under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation etc. However, if you feel you have been treated detrimentally as a result of raising a concern, you must tell us at once. First inform your Nextwave Line manager and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.

All whistleblowers are afforded the same protection, so you must not threaten others who have raised concerns or carry out reprisals against them. You may face disciplinary action which could include dismissal for gross misconduct, if we find that you have. You may also face legal action from the whistleblower in these circumstances.

Taking your concerns outside Nextwave

This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside of NEXTWAVE to become involved when a whistleblowing allegation is made.

In some exceptional circumstances, you may need to go to an external body — an industry regulator, for example can direct you towards the appropriate regulator for the type of issue you want to raise.

This policy covers the actions of third parties such as suppliers, service providers, and customers, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your Nextwave Line manager or Nextwave HR department will be able to explain how you should proceed.

Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Public Concern At Work before being justified in approaching the press.