

# Whistleblowing Policy

## Why do we have a whistleblowing policy?

MPM Products is committed to conducting business with honesty, integrity, and high ethical standards. This policy sets out how to raise a concern, how it will be handled, the protections available to you, and the governance arrangements that ensure independence and accountability.

MPM is committed to ensuring appropriate and effective grievance and whistleblowing mechanisms are available to all employees, regardless of location. For employees based in countries outside England and Wales (“third countries”), locally applicable grievance and whistleblowing policies are in place, developed in accordance with local legal requirements and aligned to MPM’s corporate Human Rights Policy. Copies of these policies are available upon request.

This policy applies to all UK colleagues including employees, workers, agency workers, contractors, consultants, volunteers, trainees, and job applicants. Third parties with whom we have a relationship, such as suppliers and other business partners, may also use these channels to report concerns. This policy does not form part of your terms and conditions of employment and may be subject to change at the company’s discretion.

Whistleblowing is when an employee knows, or suspects, that there is some wrongdoing or dangers occurring within the company such as criminal activity, or a danger to health and safety or to the environment and alerts the employer or the relevant authority.

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work.

We recognise that raising a whistleblowing concern can be scary but, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

## What type of issues would be a whistleblowing concern?

Although this list is not exhaustive, examples of situations in which it might be appropriate for you to report a wrongdoing include:

- Criminal offences.
- Breaches of legal or regulatory obligations.
- Miscarriages of justice.
- Danger to health and safety.
- Environmental damage.
- Breaches of human rights, including modern slavery, forced labour, and child labour.
- Violations of MPM’s Human Rights Policy, specifically the governance responsibilities outlined in Section 3.2.
- Non-compliance with ethical sourcing, social governance, or supply chain responsibility.
- Attempts to cover up any of the above.

## How do I raise whistleblowing concern?

If you know or suspect that some wrongdoing is occurring within the Company, you should raise the matter immediately to your Line Manager or to HR.

If you have a genuine concern related to any of the matters listed above, you should raise it internally at the earliest opportunity by:

- Speaking directly to your line manager.
- Contacting the Human Resources department.
- Reporting directly to the Human Rights Due Diligence Team

We will keep your identity confidential on a strict need-to-know basis and will take reasonable steps to protect it throughout the process. You may report anonymously. Anonymous reports will be assessed and investigated as far as possible, but anonymity may limit our ability to investigate or provide feedback.

## What happens once I have raised a concern?

Any manager who is informed by an employee of potential wrongdoing will take immediate action to discuss with HR and investigate the situation. In doing so, the manager will take every possible step to maintain the anonymity of the employee who has made the allegation.

You'll be kept informed of any investigation that is taking place and will be informed of the outcome of the investigation. It might not always be appropriate to tell you the detail of any action that is taken, but you'll be informed if action is taken.

We aim to:

- Complete an initial assessment within 14 calendar days.
- Provide periodic updates during the investigation, with frequency appropriate to the case.
- Share an outcome summary at the conclusion of the process where appropriate and permissible.
- There may be limits on the level of details we can share to protect confidentiality, privacy, and legal privilege.
- Acknowledge receipt of your concern within 7 calendar days.

Complete an initial assessment within 14 calendar days to determine next steps.

Provide periodic updates during the investigation, with frequency appropriate to the case.

Share an outcome summary at the conclusion of the process where appropriate and permissible.

There may be limits on the level of detail we can share to protect confidentiality, privacy, and legal privilege.

Concerns relating to human rights or governance will be escalated to the Human Rights Due Diligence Team or relevant Senior Leadership Team members where necessary.

## Should I inform outside bodies to a potential wrong doing?

You should always, in the first instance, talk to your Line manager about a potential wrongdoing. If you're not satisfied with the response, you're entitled to contact a relevant external body to express the concerns. In doing this you should:

- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body
- have a reasonable belief it's in the public interest to make the disclosure

In certain circumstances, it may be appropriate to report concerns to external bodies, including:

- Relevant regulatory authorities.
- Prescribed persons or bodies listed by the UK Government.
- Independent human rights organisations.

Guidance can be found at:

- <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>
- <https://protect-advice.org.uk>
- <https://www.citizensadvice.org.uk>

You are not required to report internally first. Consider obtaining independent advice if you are uncertain about making an external disclosure. In certain circumstances we may also be required to notify or cooperate with external authorities.

## **I'm worried about raising a concern, will I be treated differently?**

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we'll make sure that you're treated with respect and provided with adequate support and protection.

A protected disclosure is information you disclose with a reasonable belief that it is in the public interest and tends to show wrongdoing, such as a criminal offence, breach of a legal obligation, health and safety risk, environmental damage, a miscarriage of justice, or concealment of any of these. You do not need proof; a reasonable belief, raised in good faith, is sufficient. Protection can apply whether the disclosure is made internally or to a prescribed person or regulator where the legal criteria are met.

You have the right not to be subjected to dismissal or any detriment because you made a protected disclosure, whether internally or to a prescribed person/regulator where the criteria are met. Detriment includes, for example, demotion, loss of opportunity, reduction in pay or hours, bullying, harassment, ostracism, or any other adverse treatment. Any retaliation or instruction to deter you from raising or pursuing a concern will not be tolerated and will be treated as a disciplinary matter.

If you're told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you've raised a whistleblowing concern, you should report the matter to your line manager or HR. Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

## Further guidance

Training on this policy and the use of whistleblowing channels is provided at induction and periodically thereafter. Targeted training is provided to managers, investigators, and others with responsibilities under this policy, including on confidentiality, independence, and protection from detriment. Awareness materials will be made available to workers and relevant third parties.

Further information or clarification can be sought from the [Data Compliance Team](#).

If you need further external guidance or support, you can contact the whistleblowing charity [Protect](#) or [Citizens Advice](#) for free confidential advice.

*This policy supports MPM's human rights due-diligence approach in line with the UN Guiding Principles on Business and Human Rights and applicable EU sustainability legislation, including the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD). Regionally applicable grievance and whistleblowing mechanisms form part of MPM's broader access-to-remedy framework.*