



ASPIRE
LIMITED

Whistleblower Policy

1) CONTEXT

At Aspire we are committed to conducting our business in a way that is consistent with our Values and Code of Conduct. From time to time, employees and other stakeholders may observe potentially unethical, unlawful or unsafe conduct and practices which concern them. The Aspire Group Whistleblowing Policy (the "Policy") sets out how to report issues and concerns confidentially or, if preferred, anonymously. Aspire does not tolerate any form of retaliation against anyone for raising or helping to address a concern.

This Policy:

- I. Describes "YourVoice" - Aspire's whistleblowing programme, which incorporates the YourVoice reporting channel that can be used to report issues and concerns.
- II. Sets out what types of concerns that can be reported under the Policy.
- III. Explains the commitments Aspire makes to those who report their concerns under the Policy.
- IV. Describes how to use Aspire's YourVoice reporting tools.

As a means of reinforcing Aspire's values, YourVoice serves to build employee, customer, supplier and stakeholder trust through being an important means by which we can identify and address events that are contrary to our values. Through the YourVoice programme, Aspire aims to comply with applicable whistleblowing laws.

For ease of reading, we use generic language in describing the Aspire Group, and this is further explained in the Glossary at the end of this document.

2) DOES THIS APPLY TO ME?

This Policy is applicable to Aspire and all its managed operations globally (subject to local law and regulation).

If you see an individual or the company act or behave in a way which you think might be unethical, unlawful or unsafe, or contrary to our Values and Code of Conduct, you have a responsibility to bring this to the attention of Aspire. It is recognised this can sometimes be difficult to do, but it demonstrates our unwavering commitment to do what is right.

The YourVoice programme is available to all employees (including contractors, volunteers and trainees), customers, suppliers, other stakeholders of Aspire, as well as to colleagues, relatives or other third parties connected with or assisting someone who is reporting a concern.

If you intend to use the YourVoice reporting tool to report concerns relating to the conduct of individuals employed by or contracted to an Aspire Group company in European Union Member States, Appendix A of this Policy sets out additional information. Where there is a conflict between Appendix A and what is set out below, you must adhere to the requirements in Appendix A. Please read Appendix A carefully.

If you wish to report concerns relating to our Australian operations, please refer to the Aspire Australia Whistleblowing Policy, as this contains additional country specific provisions.

Note the YourVoice programme and the terms of this Policy do not form part of and are not incorporated into any contract you may have with your employer.

3) WHAT DO I NEED TO KNOW?

Scope of reportable issues

As noted above, this Policy covers the raising of concerns relating to potentially unethical, unlawful or unsafe conduct and practices and conduct which is contrary to our Values and Code of Conduct, including:

- I. Actions that may result in danger to the health and/or safety of people or damage to the environment.
- II. Criminal offences, including fraud, bribery, corruption and money laundering, and any violation of human rights.
- III. Conflicts of interest.
- IV. Anti-competitive behaviour.
- V. Failure to comply with any legal or regulatory obligation.
- VI. Theft, misuse or misappropriation of company assets, including unethical practices in accounting, internal accounting controls, financial reporting and auditing matters.
- VII. Breaches of Policies and Procedures, including those that underpin the Code of Conduct.
- VIII. Miscarriage of justice.
- IX. Concerns regarding bullying, harassment (including sexual harassment), victimization and discrimination as explained in our Code of Conduct, related to whistleblowing.
- X. Any other legal or ethical concern.
- XI. Concealment of any of the above.

You need to have a reasonable belief that the conduct or practices you are concerned about have been, are being or are likely to be committed, although you do not need to have firm evidence of this to raise a concern.

Whistleblower protection, confidentiality and non-retaliation The protection of whistleblowers is fundamental to the success of the YourVoice programme, as well as being a right afforded by law in some cases and jurisdictions where we operate.

Confidentiality

If you raise a concern under this Policy, we will do our best to keep your identity confidential. However, subject to any local law requirements, there may be circumstances where this is not possible. In this case, where permitted by local law or regulation, we will discuss the situation with the you.

Anonymity

If you raise a concern using the YourVoice reporting tools and do not disclose your identity, you should be aware that your identity may nevertheless become apparent during the course of the investigation of your concerns. If it does, your identity will be kept confidential as outlined above.

Non-retaliation

Aspire treats all reports seriously and is committed to treating employees fairly and protecting them against retaliation. Aspire will not tolerate any retaliation (including threats and attempts of retaliation) against an individual for raising a concern, making a report, or assisting in an internal or external investigation. No employee who makes a disclosure, reasonably believing it to be true, will as a consequence of making the disclosure be subject to retaliation, which includes being:

Subjected to any disciplinary action.

- I. Dismissed, suspended, demoted, harassed, or intimidated.
- II. Transferred against his or her will.
- III. Refused transfer or promotion.
- IV. Subjected to a term or condition of employment or retirement which is altered or kept altered to his or her detriment.
- V. Refused a reference or provided with an adverse reference.
- VI. Denied appointment to any employment, profession, or office.
- VII. Otherwise adversely affected in his or her employment, including employment opportunities and work security.

The equivalent protection, where relevant, is also extended to any external organisation represented by or supporting the whistleblower.

When should the YourVoice reporting tools be used?

Concerns can be raised in a variety of ways:

- I. Your line manager should always be available to you as a point of contact to hear your concern.
- II. If you feel that you cannot talk to your line manager, then you should try to speak to another line manager.
- III. If you feel you cannot speak to any line managers, then you can try to speak to someone who works in a relevant supporting function, such as Safety and Sustainability, Group Legal, Human Resources or the Ethical Business Conduct (“EBC”) team.
- IV. If you cannot, or do not feel comfortable to speak up using any of the above, then you can use the YourVoice reporting tools. Please refer to Appendix A for EU requirements.

Depending on the issue, you can also use the internal grievance procedure to raise personal work-related grievances. YourVoice can also be used by employees to report personal work-related issues or concerns, if you do not feel comfortable raising this via the established HR grievance handling mechanisms. However, if you raise a concern using YourVoice and we think your concern falls within the relevant HR policy/procedure, we will also tell you.

How to use the YourVoice reporting tools?

The YourVoice channel is operated by an independent third-party service provider (the “Service Provider”), and permits concerns to be raised via a helpline or a web platform.

To report a concern, you can contact YourVoice in any of the following ways:

- I. Via the YourVoice web platform at www.yourvoice.xxxx.com and/or www.yourvoice.xxxx.com
- II. By calling the YourVoice helpline (24 hour service). You will find the local country numbers in the above mentioned YourVoice website and on the Aspire intranet site.

The service is available in multiple languages. More information about how to use the YourVoice service is available at www.yourvoice.xxxxx.com

It is helpful if you provide as much information as possible when an issue is reported, as it helps when assessing the concern raised, determining what further action is appropriate and conducting any subsequent investigation. However, the company does not expect you to have all the facts upfront and we encourage you to speak up as soon as possible.

What happens to my report?

Step 1:

You can contact YourVoice via the options and details listed above to report an issue or concern.

Please Note – YourVoice is not an emergency service. You need to contact your local authorities if you have a life-threatening issue and for Aspire Health and Safety urgent concerns also use the existing reporting processes.

Step 2:

When a report is submitted, you will receive a unique access number and you can create a password, which can be used to:

- I. receive updates on the progress of the investigation,
- II. communicate with the investigation team and provide additional information and/or
- III. allow the investigators to request further information relating to your report.

Step 3:

The Service Provider is required to protect the identity of the person reporting the concern, including never revealing the person's identity to Aspire without that person's consent.

- I. If you elect to make a report with partial anonymity, a report analyst from the Service Provider removes your name and contact details so that your identity is not disclosed to Aspire.
- II. If you elect to make a report with full anonymity, then your identity will not be recorded and, as such, will not be available to the Service Provider or Aspire.
- III. If you do not elect to make a report with partial or full anonymity, your concern will be raised on a confidential basis. Your identity will be available to the Service Provider and disclosed to the Aspire's Business Assurance Services (ABAS) team (as noted below). Your identity will be kept confidential as outlined under the 'Whistleblower protection, confidentiality and non-retaliation' above.

Whether a reporter decides to report anonymously or not, the report will be treated as confidential and only used for the intended purpose. If you are comfortable to make your identity known, it will be easier for the investigators to contact you to discuss or clarify issues to help with the investigation.

Step 4:

The report is passed on by the Service Provider to ABAS (more specifically the Ethical Business Conduct Team). Assessment and action ABAS provides acknowledgement of receipt to the reporter via the system within 2 business days of receipt of the report and allocates the report to the appropriate investigation team. The investigation team will consider what action is appropriate and action will be taken accordingly. This could include an informal review, an internal investigation, or a referral to another process such as the HR grievance process, where appropriate.

Investigation status updates might be provided to the person raising the concern. We aim to provide updates within three months. We may not be able to provide specific updates where this could affect the rights of other individuals.

Status updates might be accessed by phoning the Service Provider's call centre or logging into the website that was used to create the original report, using the unique access number and password created.

Personal information

Aspire is responsible for personal information processed by YourVoice. This includes personal information provided to the Service Provider by a whistleblower. Personal information is disclosed to ABAS as set out above under 'What happens to my report'. Personal information may also be disclosed in accordance with Aspire's privacy notice and applicable data privacy laws.

For more detailed information on how Aspire uses and discloses personal information, the protections we apply, the legal bases for our use of personal information, and your data protection rights, please see the privacy notice which is available online.

What do I need to do?

It is the responsibility of all employees to be aware of this Policy, and to read, understand and adhere to the Policy and to any updates to the Policy.

General Communication

The YourVoice programme is actively and regularly promoted in the workplace, including specific focus during new employee induction. Aspire will communicate the YourVoice programme to external stakeholders when considered relevant and appropriate, and where required by law.

4) MONITORING AND REPORTING

All concerns submitted through YourVoice will be promptly assessed, appropriately addressed and closed out. Individual feedback will be provided as set out above.

Trend analysis of reports received through YourVoice and their resolution is conducted on an aggregated, anonymised basis to identify potential recurrent themes or topics of concern. The outputs of this process and general feedback on the programme are reported to the Aspire plc Audit Committee on a regular basis.

The parties responsible for ensuring, and overseeing compliance with this Policy are as follows:

- I. 1st Line: Business Units and Group Functions are responsible for ensuring compliance with this Policy.
- II. 2nd line: Ethical Business Conduct team are responsible for providing complementary expertise, support, monitoring, and challenge relating to compliance with this Policy.
- III. 3rd line: Internal Audit are responsible for providing independent assurance on the adequacy and effectiveness of the Policy controls in meeting the Policy objectives.

Consequences of breach

Any incident of retaliation against a person who raises concerns pursuant to this Policy may be subject to disciplinary proceedings up to and including dismissal. In the event of a suspected breach of legislation in this regard, Aspire reserves the right to refer the matter to the relevant authorities.

Where an individual knowingly and deliberately reports false information, or intentionally provides false information to those who are conducting an investigation into reported concerns, the protections provided in this Policy will not be available to them, and if they are an employee they may face disciplinary proceedings.