



WHISTLEBLOWER POLICY - EXTERNAL

31 MARCH 2025 – VERSION 1.2

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P U B L I C

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WHISTLEBLOWER PROTECTION POLICY

1 PURPOSE

Gemserv Ltd is committed to fostering an ethical workplace. This policy protects individuals who report misconduct, ensuring they can do so without fear of retaliation.

2 SCOPE

This policy applies to all employees, contractors, suppliers, and stakeholders who report concerns related to:

- Fraud, corruption, or financial misconduct.
- Violations of laws, regulations, or company policies.
- Environmental or health and safety risks.
- Harassment, discrimination, or unethical behaviour.

3 REPORTING A CONCERN

Concerns can be reported through any of the following confidential channels:

- **Email:** grc@gemserv.com
- **Whistleblower Form:** [Insert internal/external link]
- **Mail:** FAO: Head of Governance, Risk & Compliance (GRC), Gemserv Ltd, 77 Gracechurch Street, London, EC3V 0AS

Reports may be submitted **anonymously**; however, including contact details allows for follow-up and better resolution.

4 INVESTIGATION & RESOLUTION

- An impartial investigation will be conducted.
- Findings and corrective actions will be communicated where possible, while maintaining confidentiality.

5 PROTECTION FROM RETALIATION

Gemserv strictly prohibits retaliation against anyone who raises a concern in good faith. This includes:

- Dismissal or demotion
- Harassment or victimisation
- Supplier contract termination



- Blacklisting or damaging reputation

If a whistleblower believes they are experiencing retaliation, they may escalate directly to:

- **Head of Governance, Risk & Compliance** – grc@gemserv.com
- Or request escalation to a senior executive outside the direct reporting line.

Whistleblower protection applies equally to **external individuals**, including employees of suppliers, clients, and partners.

6 CONFIDENTIALITY & SUPPORT

All concerns will be handled confidentially. Gemserv will protect the identity of the whistleblower wherever possible. Anonymous concerns will be considered if sufficient detail is provided to support a fair investigation.

For further guidance, employees and stakeholders are encouraged to contact Gemserv's GRC team.

7 WHAT IS NOT COVERED

The whistleblowing policy does **not** cover:

- Customer service complaints (use the public grievance process)
- Employment grievances (handled under internal HR grievance procedures)
- Issues already under litigation or external investigation

8 ENFORCEMENT AND CONSEQUENCES

Any individual found to have retaliated against a whistleblower or obstructed an investigation will be subject to disciplinary action, which may include termination of employment or contracts, and legal action.

9 OVERSIGHT AND REVIEW

The policy is reviewed **annually** by the Governance, Risk & Compliance function and approved by senior management.



To find out more please contact:

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