

WHISTLEBLOWER POLICY

Policy Name	Whistleblower Policy
Policy Owner	Director - Organisation Effectiveness
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1. Objective

Kindred's purpose is to transform gambling by being a trusted source of entertainment that contributes positively to society. Kindred is committed to the highest possible standards of openness, integrity and accountability and encourages any individual who has genuine concerns about any form of malpractice in the organization to raise those concerns at an early stage. The purpose of this policy is to outline how the employee can raise such a concern; with the Company's guarantee that such concerns will be treated seriously and investigated properly. This policy aims to provide protection against detriment or dismissal on the ground that the employee has disclosed a concern, as long as such disclosure is made in good faith, in the reasonable belief that the disclosure tends to show malpractice (as specified below), and in accordance with this policy.

2. Scope

In operating this policy, the Company will:

- observe any applicable law which gives legal protection to workers against being dismissed or penalized in any way as a result of making a protected disclosure for specified acts of serious malpractice;
- ensure that no discrimination occurs, when addressing concerns that have been raised;
- ensure that individuals receive a considered response to their concerns;
- reassure workers that they will be protected from any possible reprisals or victimization if they have raised their concerns in good faith and to appropriate persons; and emphasize to managers and workers that victimizing people who raise genuine concerns is a disciplinary offence, as is raising an allegation maliciously;
- maintain an anonymous "Speak Up" website/portal (Ethics Point) for employees to register any concerns.

3. Principles

Concerns covered by this policy

The policy is intended to deal with serious or sensitive concerns about wrongdoings in the following areas:

- Criminal activity;
- Failure to comply with a legal obligation;





- Miscarriage of justice;
- Danger to health and safety;
- Damage to the environment;
- Financial malpractice or impropriety or fraud;
- Failure to comply with Gaming regulations;
- Improper conduct or unethical behaviour; and
- Attempts to conceal any of the above.

This list is an indication of the forms of malpractice which may cause concern but is not restricted in any sense. Workers are encouraged to report any form of malpractice causing them concern.

It is not necessary to show that malpractice has been committed, is being committed or is likely to be committed, but merely that the worker has, or had, a reasonable belief that this was, or was likely to be, the case. The disclosure can relate to any wrongdoing anywhere in the world; it is not restricted to matters purely arising just in the country of employment.

4. Procedure

Concerns outside the scope of this policy

The policy does not cover complaints against action taken, or intending to be taken, by the Company, the management team or colleagues which has placed, or could place, an individual at a particular disadvantage in respect of his or her duties, terms and conditions of employment, or relationships with co-workers. If an individual wishes to raise such a complaint, they should use the Company's Grievance Procedure.

Protection against victimization

The Company appreciates that the decision to raise a concern can be a difficult one to make, not least because there may be a fear of reprisal from those who may be committing malpractice or others who may be involved. The Company will not tolerate victimization of any person who raises a concern in good faith, even if it transpires that there is no basis for concluding that any malpractice has occurred, or is likely to occur, and will take appropriate steps to protect them, including taking disciplinary action against anyone who is found to be pursuing any form of retaliation or has threatened to do so.

Confidentiality and anonymity

The Company recognizes that an individual may not wish to be identified while raising a concern. In such circumstances, the Company will do everything possible to protect the person's identity and will not disclose it without their consent. If it proves impossible to resolve the matter without revealing the individual's identity, the member of management dealing with the matter will discuss with them whether and how to proceed. In some cases, however, confidentiality cannot be absolutely guaranteed as the very fact of the investigation may serve to reveal the source of the information, the statement of the person raising the concern may be needed as part of evidence against the perpetrator, or legal proceedings at a later stage may require the individual to appear as a witness.

Malicious allegations

Just as the Company will seek to protect those who raise concerns in good faith, it will also protect those against whom claims are made, where the person raising the claim does so maliciously, knowing it to be untrue. The Company will take disciplinary action against any





employee who raises a concern maliciously, which may include dismissal. As far as issues of confidentiality are concerned, if it can be shown that there are reasonable grounds to suspect that an individual has acted maliciously, a court may order his or her identity to be revealed.

Raising a concern – the procedure

The Company encourages workers to raise the matter when it is just a concern, if they have a reasonable belief in the wrongdoing, rather than have them wait for proof or investigate the matter themselves. Acting sooner rather than later can avoid any further potential damage.

It is recognized that in some circumstances it may be inappropriate to go through the stages below either because of the nature of the employment relationship, e.g. the complaint relates to the employee's immediate superior, or where the matter is of sufficient gravity or urgency. In these circumstances, a worker may start the process at Stage 2 or Stage 3. Each step will be taken without any unreasonable delay, however, given the nature of malpractice investigations, timescales may be prolonged, but the worker will be kept up-to-date with progress.

Stage 1

The employee should, wherever possible and appropriate, seek to resolve the concern informally with the appropriate persons(s) responsible for the matter. However, if the concern cannot be resolved by this approach or if such an approach is not appropriate because of the nature of the concern, then the worker has the right to use the procedure described below.

Stage 2

The employee should raise the concern with the HR Department.

The HR representative will determine whether the senior management of the Company should be informed of the concern and respond to the employee, inviting them to a preliminary meeting. At the preliminary meeting, the concern will be discussed and the employee will be expected to produce any further evidence in relation to the matter, such as documents and names of witnesses.

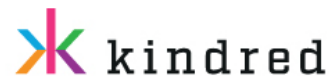
The concern will then be investigated as quickly as possible, possibly by a member of the Compliance department or an independent investigator. The HR representative will consider the investigator's report and decide if there is a prima facie case to answer. If, on the balance of probabilities, there is evidence of malpractice, they will be responsible for taking appropriate action to remedy the situation.

The HR representative will meet with the employee, explain the outcome of the investigations and, if there is evidence of malpractice, the actions taken or to be taken. If the employee is not satisfied with the outcome, they have the right of appeal at Stage 3.

Stage 3

If an employee does not feel comfortable raising their concerns via Stage 1 or 2, they should raise a whistleblowing report via Kindred's whistleblowing portal "[Ethics Point](#)" which can be accessed via Konnect. Employees have the option to report anonymously using this tool. When a report has been raised this will be sent to the Director of Internal Audit and The Chair of the Board Audit Committee ahead of investigation.





Internal Audit will investigate the allegation independently, this investigation is likely to include a call/meeting/anonymous conversation using the portal with the whistleblower (if the information is available).

Once Internal Audit have completed their investigation the reports will be shared with the Board Audit Committee and all necessary corrective actions will be taken.

Operating principles for investigating complaints

An investigation to establish all relevant facts will be conducted as sensitively and speedily as possible. Investigations may be carried out by a member of the Compliance Department, Internal Audit or an independent investigator who has had no previous involvement in the matter. In some instances it might be necessary to refer the matter to an external authority for further investigation, such as the Police. At the end of the investigation, the investigator will analyse all the evidence and make findings of fact, based upon the balance of probabilities, as to whether malpractice has occurred or is likely to occur.

Record keeping

The Company recognizes that it is important, and in the interests of both employer and worker to keep written records during the concern raising process. Records, which will be treated as confidential and kept in accordance with local legislation, include:

- the nature of the concern raised;
- a copy of the worker's letter setting out the nature of the concern;
- the independent investigator's report;
- the Company's written response, including any action taken and the reasons for action taken;
- whether there was an appeal and, if so, the written response setting out the outcome;
- minutes of meetings; and
- subsequent developments



Governance and Maintenance Framework			
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