


Document Title	Global Whistleblowing policy	
Document Status	Active	
Prepared by	Group Legal	
Approved by	Executive Director and Company Secretary, Lucy Group Ltd	
Date approved	July 2020	
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Global Whistleblowing Policy

Purpose

To set out Lucy Group’s policy, while you are working for or representing any Lucy group company (“Group”), for reporting any fraud, misconduct or wrongdoing by workers (as defined below) within the Group or by individuals within our supply chain, customers and third party partners so that such matter can be reported and properly investigated by the Group .

Scope

This policy applies to all individuals in all group companies working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, apprentices, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, (collectively referred to as “workers” in this policy) or our agents or any other person working with us, wherever located.

This policy does not form part of any worker's contract with the relevant group company and it may be amended at any time.

Policy

1 About this Policy

- 1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

2 What is Whistleblowing?


- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

3 How to raise a concern

- 3.1 We hope that in many cases you will be able to raise any concerns with your manager, or, if necessary, his or her manager. However, this is not possible, for example because the matter concerns them, you should contact the dedicated third-party whistle-blowing hotline whose contact details are at the end of this policy.
- 3.2 We will take appropriate action, as deemed necessary by the company, to deal with your concern, including but not limited to, discussing your concern further with you or investigating your concern as appropriate.

4 Confidentiality

- 4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

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5 External Disclosures

- 5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 5.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

6 Protection and Support for Whistleblowers

- 6.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your local HR manager or the Regional or UK Head of HR Operations as applicable depending on your location.
- 6.3 We will not tolerate any threat or retaliation against whistleblowers. If you are involved in such conduct you may be subject to disciplinary action.
- 6.4 However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

7 Contacts

- 7.1 Navex Hotline

Country	Telephone Number
United Kingdom	0800 086 8401
Brazil	0800 591 1839
China	400 120 4133
India	000 800 0502 105
Kenya	0800 211 135
Malaysia	1 800 81 6121
Saudi Arabia	8008500704
South Africa	080 098 0452
Thailand	1 800 012 349
United Arab Emirates	800 0321048

- 7.2 Navex Website: https://secure.ethicspoint.eu/domain/en/report_custom.asp?clientid=106502