



Global Whistleblowing Policy

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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 in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The purpose of this policy is to:
- (a) Encourage employees, former employees, candidates, and parties with whom Job&Talent has a business relationship (such as contractors, subcontractors, and suppliers) to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - (b) Provide guidance as to how to raise those concerns.
 - (c) Reassure all whistleblowers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 We reserve the right to amend this policy at any time.

2. Who does this policy apply to?

This policy applies to all our employees, officers, consultants, self-employed contractors, casual workers, agency workers, suppliers, volunteers and interns.

3. Doing the right thing

We expect everyone who works with us to comply with our Code of Conduct, our policies and procedures (available on our website), professional standards, laws and regulations.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance officer, who will involve the C-level where and if appropriate.

4. Who is responsible for this policy?

- 4.1 The Legal and People & Culture departments have overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 4.2 The compliance officer has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance (the “**Compliance Officer**”). The Compliance Officer must ensure that regular and appropriate training is provided to all managers and other staff who may deal with concerns or investigations under this policy.

5. What is Whistleblowing?

- 5.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- (a) criminal activity;
 - (b) failure to comply with any legal or professional obligation or regulatory requirements;
 - (c) miscarriages of justice;
 - (d) danger to health and safety;
 - (e) damage to the environment;
 - (f) bribery;
 - (g) facilitating tax evasion;
 - (h) financial fraud or mismanagement;
 - (i) breach of our internal policies and procedures, including our Code of Conduct;
 - (j) conduct likely to damage Job&Talent’s reputation or financial wellbeing;
 - (k) unauthorised disclosure of confidential information;
 - (l) negligence; and
 - (m) the deliberate concealment of any of the above matters.
- 5.2 A **Whistleblower** is a person who raises a genuine concern related to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a “**Whistleblowing Concern**”) you should report it under this policy.

- 5.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the relevant internal procedures, as appropriate.
- 5.4 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out at paragraph 5.1 above (for example, a breach of our internal policies), you should discuss with the Compliance Officer which route is the most appropriate.
- 5.5 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Compliance Officer.

6. Raising a Whistleblowing Concern

- 6.1 We hope that in many cases you will be able to raise any concerns with your line manager or the People and Culture Department in your jurisdiction. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Compliance Officer.
- 6.2 However, where the matter is more serious or you feel more comfortable by remaining anonymous, you should report the situation through our Whistleblower Channel. Alternatively, you may send a letter to the postal address Av. Pablo Iglesias 30, 28039 Madrid, Spain.
- 6.3 Before making your Whistleblowing Concern you should satisfy yourself that you have reasonable grounds to suspect reportable conduct. 'Reasonable grounds to suspect' means that your concern is based on objectively reasonable grounds, even if you don't have concrete proof. In practice, a mere allegation with no supporting information is unlikely to reach that standard. However, a Whistleblower does not need to prove their allegations. In addition, the Whistleblowing Concern can still qualify for protection even if the disclosure turns out to be incorrect.
- 6.4 To make a Whistleblowing Concern you may access the Whistleblower Channel, available on our website.
- 6.5 If possible, all reports should include at least the following information:
 - (a) date and location;
 - (b) your relationship with Job&Talent (worker, internal employee, contractor / freelance, third party / supplier, or other);

- (c) names of person(s) involved, roles and their business group;
- (d) your relationship with the person(s) involved;
- (e) the general nature of your concern;
- (f) how you became aware of the issue;
- (g) possible witnesses; and
- (h) other information that you have to support the report.

7. Confidentiality

7.1 We hope that staff will feel able to voice Whistleblowing Concerns openly under this policy. However, you may also raise your concern confidentially or anonymously:

- (a) **Confidential reports:** your identity will be known only to the case managers handling your report and will be treated as confidential. It will not be disclosed to any other party involved in the investigation without your consent.
- (b) **Anonymous reports:** your identity will not be known to anyone at any stage of the process.

8. Investigation and outcome

- 8.1 Once you have raised a concern we will acknowledge receipt within seven days. Complaints will be investigated promptly, impartially and appropriately in line with Job&Talent's approved investigation guidelines.
- 8.2 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or special knowledge of the subject matter. The investigator (or investigators) may make recommendations to enable us to minimise the risk of future wrongdoing.
- 8.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation, the outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 8.4 If we conclude that a Whistleblower has made false allegations maliciously, the Whistleblower will be subject to disciplinary action under applicable local legislation.



9. If you are not satisfied

- 9.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

10. Protection and support for Whistleblowers

- 10.1 It is understandable that Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2 Whistleblowers must not suffer any detrimental treatment or retaliation as a result of raising a concern. Detrimental treatment or retaliation includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the People & Culture department immediately. If the matter is not remedied you should raise it formally using our internal procedures, as applicable.
- 10.3 You must not threaten or retaliate against Whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.