WHISTLEBLOWING POLICY

It is understood that employees and workers may, at one time or another, have concerns about what is happening at work or within the organisation. Generally, these concerns can be easily resolved. However, some concerns may be about serious malpractice.

This policy therefore provides a procedure to enable employees to raise concerns about actual or possible serious malpractice at an early stage and to provide assurance to employees that any matters raised will be dealt with seriously, without fear of reprisal and, where possible, confidentially.

Surgical Holdings is committed to operating its business within current legislation and to the highest standards of professional conduct. In order to operate effectively within these values, it is essential that employees and workers feel able to raise concerns with the Company.

Concerns about Malpractice

It is not possible to give an exhaustive list of the activities that might constitute misconduct or malpractice but, broadly speaking, employees would be expected to report any of the following:

- Criminal offences;
- Failure to comply with legal obligations;
- Miscarriages of justice;
- Actions that endanger the health and safety of employees or the public;
- Actions which cause damage to the environment;
- Bribery or corruption (please see Bribery and Corruption Policy);
- Actions which are intended to conceal any of the above.

In order to raise a concern, you do not have to have evidence of the malpractice but must have a reasonable belief that the malpractice has occurred.

Raising a Concern

If you have a concern, you may use the Company's Grievance Procedure (please see Grievance Procedure). If, however, you feel unable to do this for any reason, you should raise their concern with an Authorised Manager.

Where possible, you should put your concern in writing in order to outline the nature of the suspected malpractice. Alternatively, concerns can be raised verbally, but you must make it clear that you are raising a concern under the Whistleblowers Policy, in order to avoid any misunderstanding about the nature and seriousness of the verbal communication. When raising a concern, you must declare any personal interest you have in the matter.

Investigation

Having been alerted of a concern, it is the Company's responsibility to investigate the issue. This will include discussions with you and then assessing what further action or investigation is required.

All concerns raised under this procedure, regardless of their nature, will be treated seriously and sensitively. Where practicable, immediate steps will be taken to remedy the situation, however, depending on the nature of the issue that has been raised, it may take a period of time to fully investigate the matter.

Every effort will be made to maintain your confidentiality if you so wish. If this is not possible, this will be fully discussed with you (e.g. if the outcome includes Court proceedings or disciplinary action).

You will be informed of the outcome of the action taken to resolve the concern (subject to legal constraints). Where no action is taken, a full explanation will be given. The Company will also consider future action to minimise the risk of reoccurrence wherever possible.

Employee Protection

The Company will not tolerate harassment or victimisation of anyone who raises a concern under this procedure, regardless of whether or not the concern proves to be founded or unfounded.

Employees should not be discouraged from raising concerns due to actual or possible pressure from other work colleagues, employees, or management. Discouraging another to come forward with a concern is a disciplinary offence and will be dealt with under the Disciplinary Procedure.

Employees are further protected under legislation (Public Interest Disclosure Act 1998) against being dismissed or being subject to some other detriment because they have raised a concern about possible malpractice.

Raising Concerns Externally

The Company would prefer you to raise concerns using the above procedure. You may however, despite the assurances provided in this policy, feel unable to raise concerns internally and believe it is more appropriate to raise your concern with an external organisation, such as a regulator. It is open to you to do so, provided you have sufficient evidence to support your concern.

There is a list of prescribed organisations that disclosures can be made to (Public Interest Disclosure Act 1998, as amended by the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2003).

Employees may also wish to seek advice before raising a concern and may contact Protect (www.protect-advice.org.uk), a registered charity that advises on serious malpractice within the workplace. They can be contacted on 020 3117 2520 or whistle@protect-advice.org.uk.

Variations to Policy

The Company's decision as to the interpretation and operation of this Policy is final. The Company reserves the right to amend or terminate this Policy at any time.

All employees of the Company shall take note of this Whistleblowing Policy and Objectives and commit to the effective maintenance and continual improvement of the Company's Whistleblowing Policy and all that it encompasses.

The Directors of the Company endorse the requirements as set out in this Policy.

Signed: Daniel Coole (Nov 10, 2026 13:00:48 GMT)

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Daniel Coole (Managing Director)

Whistleblowing Policy (iss 1 Oct 2021, reviewed Nov 2026)

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