

Global Whistleblowing Policy <i>August 2025</i>	Document VNO: 02.1
	Amendment No: 03
	Approved By: Alex Panayi, Global CFO
	Approved Date: 05-Aug-2025
	Renewal Date: 05-Aug-2026

Global Whistleblowing Policy

Purpose

The Unispace Group (the “Company”) is committed to the highest standards of integrity and ethical values and practices. As part of this commitment, the Board and Senior Leadership Team encourage all current and former team members (including, but not limited to permanent, casual, fixed term employees and temporary workers) (“Employees”), as well as contractors, suppliers and their employees (“Stakeholders”) to raise any concerns they may have in relation to behaviour that may not adhere to these high standards.

The purpose of this Policy is to outline the method for Employees and Stakeholders, where they have reasonable grounds, to raise concerns about improper behaviour, clarify the persons to whom disclosure of concerns may be made and how they can be made, while also offering protection from victimisation, harassment or retaliation.

Policy Scope

The Company encourages complaints, reports or inquiries about illegal practices or serious violations of the Company’s policies, including illegal or improper conduct by the Company itself, by its leadership, or by others on its behalf. While Unispace expects that most concerns will be raised internally, there may be exceptional situations where this may not be appropriate or possible. For those situations, Unispace has developed additional whistleblowing channels to protect such reporting, as described below.

Whistleblowing is where an individual raises a concern about danger or illegality that has a public interest aspect to it.

The kinds of malpractice covered by this Policy include criminal offences, financial impropriety, corruption, tax evasion, bribery, modern-day slavery violations, danger to the health and safety of any individual, environmental damage, breach of any legal obligation or other illegal practice including concealing any of the above.

This Policy does not set out the procedure to be followed for general grievances (i.e. a complaint that generally relates to an individual’s own employment position or personal circumstances at work). Please refer to the Company’s grievance procedure in the [People Handbook](#). Other subjects on which the Company has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment, employee grievances, or similar matters via Unispace’s People and Culture channels, unless those channels are themselves implicated in the wrongdoing. This Policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

Who can raise concerns

This Policy applies to all our employees, officers, consultants, contractors and to other workers including agency workers, casual workers and home workers.¹

This Policy does not form part of any contract of employment and may be amended at any time.

How to raise a concern

If an Employee or Stakeholder becomes aware of any danger or illegality that has a public interest aspect to it, and have deemed the ordinary reporting channels insufficient, they should raise their concern through the following channels:

- Unispace’s Whistleblower Protection Officers (“WPOs”): Group Chief Legal Officer, or Group Chief Product Officer, by emailing disclosures@unispace.com or directly to their email addresses.
- Unispace’s own anonymous reporting web portal, located [here](#).

¹ In Australia, spouses and relatives of each of these individuals are also covered by this Whistleblowing Policy, as provided in the Australian Corporations Act of 2001, Section 1317AAA, and may similarly raise any concerns over any alleged improper behaviour they encounter.

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- Safecall: an independent confidential reporting line. Calls are handled by skilled staff and will be treated in complete confidence. A report of the call will be sent to Unispace's WPOs. Safecall will not disclose the reporting individual's name to the WPOs if they wish to remain anonymous, although anonymous reporting may hinder any subsequent investigation.

Safecall is available 24 hours a day, seven days a week on a freephone number (this link provides a list of local freephone numbers in different countries <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>).

Alternatively, Safecall can be contacted via the web at <https://www.safecall.co.uk/report/>

Principles

Confidentiality and protection of whistle-blower identity

All allegations of improper situation or conduct will be treated as confidential. Unispace will not disclose information to anyone not connected with the investigation without the consent of the person raising the concern (where contact details are provided for, consent to be obtained), unless the WPOs and/or the investigating officer are obliged to do so by law.

A whistleblower has the option of reporting anonymously ([through the disclosures form](#) or [Safecall hotline](#)) or identifying themselves when making a disclosure of any alleged improper behaviour in accordance with this Policy. Regardless of how the concern is reported, Unispace may need the reporting individual's participation in subsequent proceedings.

Protections for whistle-blowers from reprisal or disadvantage

Unispace prohibits retaliation by or on behalf of the Company against whistleblowers for making good faith complaints, reports or inquiries under this Policy or for participating in a review or investigation under this Policy. Such retaliation includes but is not limited to dismissal or demotion, reprisals from other Employees, including intimidation, harassment, discrimination and victimisation. It can also include subtle behaviours, such as withholding information that would assist an employee in their role, excluding a whistleblower from social functions, not providing meaningful work, and the use of different voice or body language, or communicating differently compared with recent communications or communications with others. Any person involved in such behaviour may be subject to disciplinary action.

Any whistleblower who feels they have been retaliated against as a result of making a disclosure should contact Unispace's WPOs to discuss their concerns. This protection extends to those whose allegations are made in good faith but prove to be mistaken. However, Unispace reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this Policy.

All concerns raised will be investigated in a fair and objective manner, including the involvement of external parties where appropriate. The investigation will be completed as soon as practicable. To ensure protection of all our staff, anyone who makes a frivolous or malicious claim or an allegation made for personal gain or one which they do not reasonably believe to be true may also be subject to disciplinary action.

Responsibilities

Each Employee is responsible for understanding how they can report any behaviour or practices which do not meet Unispace's high standards of integrity and ethical values .

In addition, there are specific responsibilities for certain individuals as a part of this Policy as follows:

Group Chief Product Officer and Group Chief Legal Officer

The Group Chief Product Officer and Group Chief Legal Officer are responsible for devising, implementing and managing the Whistleblowing Policy and strategy. They are also responsible for ensuring that this Policy is regularly reviewed and, if necessary, updated.

Alex Panayi
Alex Panayi (Aug 5, 2025 13:18:18 GMT+1)

Alex Panayi, Unispace Global CFO

Word template (branded)

Final Audit Report

2025-08-05

Created:	2025-08-05
By:	Harriet Malcolm (harriet.malcolm@unispace.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA7Cd_dPIWmbXYztHiJPx5S-KmzvUN8qGZ

"Word template (branded)" History

-  Document created by Harriet Malcolm (harriet.malcolm@unispace.com)
2025-08-05 - 11:37:45 AM GMT
-  Document emailed to Alex Panayi (alex.panayi@unispace.com) for signature
2025-08-05 - 11:37:48 AM GMT
-  Email viewed by Alex Panayi (alex.panayi@unispace.com)
2025-08-05 - 11:37:51 AM GMT
-  Document e-signed by Alex Panayi (alex.panayi@unispace.com)
Signature Date: 2025-08-05 - 12:18:18 PM GMT - Time Source: server
-  Agreement completed.
2025-08-05 - 12:18:18 PM GMT