



# CLVM Whistleblower Policy

Prepared by: Jo Reid, CEO, Calvium Ltd

Prepared for: Internal Use

Classification: *Confidential*

CALVIUM<sup>o</sup>

Company Registration No: 07055812

VAT registration No: 112476634

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## Document Revision History

Version	Date	Changes	Reviewed by
1.0	2 Jan 2025	Initial version	R Alvy

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# Whistleblower Policy

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## 1. Purpose

Calvium is committed to maintaining the highest standards of ethics, integrity, and transparency in all aspects of its operations. This Whistleblower Policy provides a secure and confidential channel for suppliers, partners, and any third parties working with Calvium to report concerns about unethical, illegal, or improper conduct without fear of retaliation, in line with B Corp values and principles.

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## 2. Scope

This policy applies to all employees, contractors, suppliers, partners, and any third parties working with Calvium. It covers concerns related to, but not limited to:

- **Fraud or financial misconduct:** Misappropriation of company funds, corruption, bribery, or falsification of financial records.
  - **Violations of laws or regulations:** Breaches of legal or regulatory requirements.
  - **Unethical business practices:** Actions contrary to Calvium's Code of Conduct or B Corp commitments, including work that negatively impacts society or the environment.
  - **Harassment or discrimination:** Any behavior that undermines an inclusive and respectful workplace.
  - **Health, safety, or environmental risks:** Practices or policies that jeopardise the well-being of employees or the community.
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## 3. Reporting Procedure

Calvium encourages concerns to be reported promptly through the following channels:

1. **Employees & Contractors should report to Immediate Supervisor or Manager:** If comfortable, concerns can be raised directly with a supervisor or line manager otherwise report to the CEO.
2. **Suppliers, partners, and any third parties working with Calvium report to the CEO:** Reports can be directed to the CEO who is the designated Whistleblower Officer at Calvium.
  - **Contact Information:** jo@calvium.com

Reports should include as much detail as possible, such as dates, individuals involved, a

description of the issue.

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#### 4. Confidentiality and Protection Against Retaliation

- **Confidentiality:** All whistleblower reports will be treated with the utmost confidentiality. The identity of the whistleblower will not be disclosed unless required by law.
  - **Non-Retaliation Policy:** Calvium strictly prohibits retaliation against anyone who reports a concern in good faith. Retaliatory actions, including termination, harassment, or discrimination, will result in disciplinary measures.
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#### 5. Investigation Process

1. **Acknowledgment:** Reports will be acknowledged within five (5) working days, where possible.
  2. **Assessment:** The Whistleblower Officer will assess the report to determine the appropriate course of action.
  3. **Investigation:** A thorough investigation will be conducted by the Whistleblower Officer and HR Dept.
  4. **Resolution:** Upon completing the investigation, Calvium will take appropriate corrective action, including addressing policy violations or reporting findings to relevant authorities.
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#### 6. Responsibilities

- **Leadership Team:** Ensures a safe and supportive environment for whistleblowers and enforces this policy.
  - **Whistleblower Officer:** Oversees the reporting process, conducts investigations, and ensures confidentiality.
  - **Employees & Contractors:** Encouraged to report concerns and cooperate with investigations in good faith.
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#### 7. Training and Awareness

Calvium will provide regular training to employees and contractors to ensure they understand their rights and responsibilities under this policy. The policy will also be

available on the company website.

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## 8. Review and Updates

This policy will be reviewed annually to ensure compliance with legal requirements, B Corp standards, and Calvium's ethical commitments. Updates will be communicated to all employees and contractors.

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**Policy Owner:** Jo Reid / CEO

**Contact Information:** jo@calvium.com

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**Signed,**

Josephine Reid

CEO

Calvium Ltd.

6 January 2025