

## Mission

At Kerv, our mission is to harness the power of technology for the good of our people, customers, society, and planet. This includes building a fair, respectful, and inclusive workplace and value chain, where all voices are heard, all concerns are handled with integrity and care, and we are accountable for our actions.

## Purpose

This policy outlines how all our stakeholders can speak-up when things have gone wrong, raising grievances or concerns with us, including how we will respond to ensure our processes are transparent, accessible, and fair, in line with international best practices.

## Scope

This policy applies globally to all individuals and groups directly or indirectly impacted by our business practices, including employees, contractors, customers, suppliers, community members, and investors. It should be used as a backstop, when our other processes have failed or cannot be used, for example due to the sensitivity of the issue, where anonymity is required, or where the concern involves serious harm or misconduct.

## Commitment

We want anyone – whether you work for us, with us, or are affected by us – to feel safe raising concerns. Speaking up helps us build a better Kerv and a better world. We commit to act on what we hear. We will do so with integrity, guided by the following principles:

- **Respect** - Every voice matters
- **Transparency** - We are clear about how grievances are handled
- **Timeliness** - Concerns are addressed promptly
- **Confidentiality** - We handle all concerns sensitively and confidentially
- **Non-retaliation** - No one will suffer reprisals for raising a concern in good faith
- **Remedy** - We commit to fair outcomes, including appeal and meaningful change

## Primary processes

Kerv is a value's lead organisation, and we have a genuine desire to support all our stakeholders positively. Concerns can most often be discussed and satisfactorily handled in an informal manner, or via other specific-stakeholder targeted routes, and where possible you are invited to do this in the first instance:

| Stakeholder  | Other Channels  |
|--|---|
| Employees (including full-time, part-time, and contract) | <a href="#">OfficeVibe</a> . Informal discussion with line manager, skip-level manager, or people-team. <a href="#">Employee Grievance Policy</a> . |
| Customers and Clients                                    | Informal discussion with service manager, account manager or programme sponsor. <a href="#">Feedback and Complaints Policy</a> .                    |

|  |   |
|--|---|
| Workers in our Value Chain                           | Informal discussion with relationship owner, accounts team or products director. <a href="#">Feedback and Complaints Policy</a> . |
| Investors, Partners, and Civil Society Organisations | Informal discussion with relationship owner, our legal team or member of our Senior Management Team.                              |
| Local Communities where we Operate                   | Informal discussion with local facility manager or governance team. <a href="#">Feedback and Complaints Policy</a> .              |

In handling concerns, good management skills are required to ensure the matter is heard, understood, and responded to in a balanced way. People managers, account managers and other leaders are encouraged to seek support in this from your Senior Management Team when required.

## What you can raise

You can formally raise *any concern*, including but not limited to:



- **Whistleblowing**  
*The disclosure of information about unlawful or unethical activity, malpractice, or wrongdoing (under the UK Public Interest Disclosure Act or similar international framework)*
- **Human Rights abuses**
- **Environmental harm**
- **Unethical conduct or business practices**
- **Legal violations** bribery, tax evasion, fraud, or other criminal activity
- **Miscarriages of justice**
- **Endangering health and safety**
- **Financial misconduct**
- **Breach of professional obligations**
- **Harassment, discrimination, or other workplace issues**
- **Unethical behaviour** including covering up wrongdoing in any of the above categories
- **Retaliation** against anyone raising a concern
- **Any other harm or potential harm** caused by Kerv's operations

## How to raise a concern

We have partnered with [Safecall](#), to provide all stakeholders the confidence to speak-up in the knowledge that concerns are handled by an independent specialist provider. You can raise a concern with them in any of the following ways:

1. **Named** - Safecall can pass your identity to Kerv.
2. **Semi-Anonymous** - Safecall will have your identity but NOT pass it to Kerv.
3. **Anonymous** - Safecall or Kerv will NOT have your identity.

In the first instance, we recommended calling to raise your concern, as this service is available 24x7 and all call handling staff are UK ex law enforcement officers, trained to help gather the information needed to expedite resolution of your concern:

-  UK [0800 915 1571](tel:08009151571)
-  India [000 800 4401 256](tel:0008004401256)

Safecall also have over 125 local telephone numbers; see here for their [Full International Telephone List](#). You are also able to raise your concern online:

- [File a Report Online](#)

Regardless of which channel you use, you should be ready to clearly articulate your concern in a clear and factual manner, referencing any supporting evidence, details of any steps you have taken to attempt to remedy the situation, and your desired outcome.

## How we'll handle your concern

We commit to handling all concerns fairly, transparently, and confidentially:

| <u>Step</u>                   | <u>Target</u>  |
|-------------------------------|--|
| 1. Acknowledgement of receipt | Within 5 working days                                  |
| 2. Initial assessment         | Within 10 working days                                 |
| 3. Investigation              | Within 30 working days (complex cases may take longer) |
| 4. Outcome                    | Communicated in writing                                |
| 5. Appeal (if appropriate)    | Available, within 10 working days                      |

Where serious harm has occurred, we will pursue appropriate remediation. Where systemic issues are identified, we will drive change.

## Protection and non-retaliation

Kerv strictly prohibits any retaliation against anyone raising a concern in good faith, or against anyone who participates in an investigation.

- If **retaliation is identified**, disciplinary action will be taken – up to and including termination of employment or contracts.
- If **confidentiality is breached**, disciplinary action will also follow.
- **External parties** will receive equivalent protection in line with international standards.

You do NOT need proof to raise a concern. A reasonable belief that something is wrong is sufficient.

## Process variation and independent investigation

We reserve the right to adjust this process on a per-concern basis, to better support a successful outcome, e.g., appointing an independent investigator. In all such instances, this will be clearly explained to you.

## Related policies

This Speak Up & Accountability Policy provides the single-entry point for all serious concerns however, it links to the following supporting policies:

- [Whistleblower Protection Policy](#)
- [Employee Grievance Policy](#)
- [Code of Ethical Practice](#)

## Responsibility and commitment to best practice

This policy is owned by the **Chief Sustainability Officer**, with oversight by the Senior Management Team. We commit providing appropriate resources to support our Speak-Up service and strive to continuously improve it, guided by the lived experience of those we serve and partner with, including:

- Communicating this policy internally and externally
- Reviewing this policy annually
- Benchmarking against best practice frameworks, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises
- Inviting comments, suggestions and other feedback on any way we can improve how we support people speaking up, via [sustainability@kerv.com](mailto:sustainability@kerv.com).