

Mission

At Kerv, we are committed to conducting our business with honesty and integrity. We foster a culture of openness and accountability, where wrongdoing is identified and addressed. We expect all staff, contractors, and partners to maintain high standards and encourage early disclosure of any concerns about unlawful or unethical conduct, or malpractice, that could harm Kerv, its stakeholders, or the public.

Commented [RA1]: Whistleblower Protection Policy

Commented [FT2R1]: Updated.

Purpose

This policy explains how Kerv protects individuals who raise concerns under whistleblower frameworks, and what they can expect after raising a concern.

This policy applies globally and complements our [Speak Up & Accountability Policy](#), which sets out how all serious concerns – including whistleblowing – should be raised.

Scope

This policy applies to all employees, contractors and anyone with direct dealings with Kerv (customers, suppliers, partners, community members).

What is whistleblowing

Whistleblowing includes, but is not limited to, raising concerns about:

- Bribery, tax evasion, fraud, or other criminal activity
- Failure to comply with legal obligations
- Miscarriages of justice
- Endangering health and safety
- Damage to the environment
- Any breach of legal or professional obligations
- Other unethical behaviour
- Covering up wrongdoing in any of the above categories

Raising concerns

All serious concerns that cannot be remedied through normal channels, including whistleblowing, should be raised through our Speak Up Service (link to website), see our Speak-Up & Accountability Policy for more details, which provides a clear and consistent process for all stakeholders.

Protections for whistleblowers

Kerv is committed to protecting whistleblowers:

- **No retaliation:** You will not be dismissed, demoted, denied promotion or benefits, harassed, or otherwise harmed because you raised a concern in good faith.
- **Confidentiality:** Your identity will not be disclosed without your consent, unless required by law or where serious risks demand it (you will be informed first where possible).
- **Right to anonymity:** You may choose to remain anonymous via the Speak Up routes – this may affect our ability to provide feedback but will not limit your right to protection.
- **No requirement for proof:** You do not need proof to raise a concern – a reasonable belief is sufficient.
- **Right to support:** You may be accompanied to any related meetings by a friend, colleague, trade union representative, or equivalent supporter.

If any retaliation is identified, Kerv will take appropriate disciplinary action, which may include termination of employment or contracts. If any breach of confidentiality occurs, similar action will follow.

We will also consider additional protections for whistleblowers in particularly vulnerable situations, including engaging independent third-party support where appropriate.

Investigations

Kerv is responsible for ensuring that all whistleblowing concerns are investigated fairly and impartially. The individual raising the concern is not responsible for investigating the matter and you should not attempt to investigate the matter yourself or directly approach those involved. Kerv may appoint an independent external investigator if appropriate.

Oversight and escalation

If you are concerned about how your disclosure is being handled, you may escalate your concern by writing to:

- The Managing Director
- The Executive Chairman

If you remain unsatisfied, you may contact an appropriate external authority, such as:

- The Advisory, Conciliation and Arbitration Service (ACAS)
- Public Concern at Work (Protect)
- Relevant regulatory or legal body

Responsibilities

This policy is owned by the **Chief People Officer**, with oversight by the Senior Management Team. We commit providing appropriate resources to support our whistleblower protections and strive to continuously improve them, 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 peopleops@kerv.com.

Legal Responsibilities

This policy complies with:

- UK Employment Rights Act (1996)
- Public Interest Disclosure Act (1998)
- ISO 9001 and ISO 26000 requirements