



REPORTING A CONCERN

WHISTLEBLOWING POLICY AND HOTLINE

INTRODUCTION

Under certain circumstances, employees and other business partners have legal protection if they make disclosures about organisations for which they work or work with. These are commonly referred to as 'whistleblowers' and their activities have often received wide publicity in the media. There is legislation designed to protect people from suffering any detriment or termination of engagement for whistleblowing.

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers, agency workers, suppliers, customers and any other of the company's supply chain or business partners.

DISCLOSURES

If you have a concern over any of the following areas it is crucial you use the procedure to report it:

- **Dishonesty,**
- **Corruption,**
- **Health & Safety,**
- **Security,**
- **Fraud,**
- **Unethical behaviour,**
- **Discrimination or Harassment**

These acts can be in the past, present or future. These concerns are taken very seriously by the Company and we will take every measure to remedy any form of malpractice.

THE PROCEDURE

If you so wish, you should in the first instance report any concerns you may have to either:

- Your Manager, or
- The HR Team or The Human Resources Director who will treat the matter with complete confidence or
- Email whistleblowing@upgs.com or
- Call Safecall, an independent whistleblowing specialist on the following numbers

SAFECALL INDEPENDENT WHISTLEBLOWING HOTLINES

Country You Are Based	FF Number
UK	0800 915 1571
Germany	00 800 7233 2255
Holland	00 800 7233 2255
China Unicom / Netcom	10800 744 0605
China Telecom	10800 440 0682
Hong Kong	3077 5524
India	000 800 440 1256

CONFIDENTIALITY

We hope that anyone will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate but will be accepted should there be no alternative option provided. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

PROTECTION & SUPPORT FOR WHISTLEBLOWERS

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Human Resources Director immediately.