

Whistleblowing Policy

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Contents

1	Introduction	3
2	Whistleblowing	3
2.1	Core principle	3
2.2	MedAccess Values and Behaviours	4
2.3	Protecting Whistleblowers	4
3	Independent Whistleblowing Helpline	5
3.1	Option 1 – Policy Specific Procedures	5
3.2	Option 2 – Line Manager	5
3.3	Option 3 - Appropriate Parties	5
3.4	Option 4 – Safecall	6
3.5	Whom Will Safecall Notify?	6
4	Investigation	6
5	Confidentiality and Data Protection	8
6	Governance	8
7	External Whistleblowers	8
8	Mapping the Whistleblowing Policy	9
8.1	Potential overlap	9
8.2	Distinguishing and coordinating other MedAccess policies	10
9	Reporting to external authorities	10

1 Introduction

This policy explains what ‘whistleblowing’ is, records MedAccess’s support for and adherence to best practice and sets out how MedAccess will apply whistleblowing principles. It incorporates a procedure for handling whistleblowing reports.

The policy has been developed pursuant to:

- MedAccess values
- Its other policy standards
- Relevant legislation
- Current corporate best practice

The policy applies to all members of staff at MedAccess, which for the purposes of this procedure applies to employees, officers, directors, consultants and contractors, temporary employees, interns and secondees. As described below it also applies to external reporters including interested third parties, stakeholders and partners.

2 Whistleblowing

2.1 Core principle

Whistleblowing is the reporting of suspected wrongdoing or dangers relating to our activities. This includes bribery, money laundering, terrorist financing, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, any breach of legal or professional obligations or other serious misconduct. In the UK examples of such breaches of legal obligations include offences under the Bribery Act 2010, the Criminal Finance Act 2017 and the Modern Slavery Act 2015.

The Public Interest Disclosure Act 1998 (the “Act”) aims to encourage a climate of openness in the workplace by giving legal protection to staff who make certain “whistleblowing” disclosures that they reasonably believe to be in the public interest. The Act protects staff who raise genuine concerns as a whistleblower, free from the threat of unwarranted dismissal or victimisation by an employer or co-workers.

Although MedAccess is an unregulated business (unlike its shareholder BII which is regulated by the UK’s Financial Conduct Authority) its policy is developed in accordance with both general applicable UK law and statute and best practice broadly equivalent to regulatory standards. Examples include maintaining a written whistleblowing policy (i.e. this document) and an independent whistleblowing channel, proactively communicating its standards and encouraging and reassuring whistleblowers if they have a concern and preserving confidentiality. In some cases MedAccess goes further than the requirements of UK financial services regulators (such as the FCA and PRA) most recently in the engagement of a confidential external whistleblowing reporting helpline provider.

All of these enhancements in policy provisions improve MedAccess’s chances of establishing a statutory defence that it had ‘adequate procedures’ including under the UK Bribery Act and Criminal Finances Act.

2.2 MedAccess Values and Behaviours

These protections deserve full consideration and support of the Board and senior management because they are also consistent with MedAccess' values and behaviours¹. In sum MedAccess aspires to act in a way which is open, honest and fair, and treats all employees fairly.

MedAccess also has a strong commitment to integrity and ethical behaviour and encourages staff who have concerns about suspected serious malpractice or misconduct or any breach or suspected breach of law or regulation that may adversely impact the company, to voice those concerns without fear of harassment or victimisation.

2.3 Protecting Whistleblowers

MedAccess will respond to any allegations or acts, or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against staff who report, disclose or investigate improper or illegal activities which they reasonably believe to be in the public interest and protect those who report such activities. This protection does not extend to a whistleblower where they have made false or bogus allegations, knowing such allegations to be false and such allegations may result in disciplinary action.

Disclosures which entitle a whistleblower to legal protection under the Act are disclosures which are made when a member of staff reasonably believes that one or more of the following matters is happening, or is likely to happen in the future:

- ▶ a criminal offence has been committed, is being committed or is likely to be committed;
- ▶ a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
- ▶ a miscarriage of justice has occurred, is occurring or is likely to occur;
- ▶ the health and safety of any individual has been, or is being or is likely to be endangered;
- ▶ the environment has been, is being or is likely to be damaged; or
- ▶ there has been a deliberate attempt to conceal any of the above.

Although the law identifies the above categories of disclosures as potentially being 'protected' and confers statutory protection for staff members making such disclosures, MedAccess recognises that there may be other, potentially serious matters outside of these categories which staff may wish to raise. These include:

- ▶ the exploitation or inappropriate treatment of third parties;
- ▶ conduct likely to damage the financial well-being, reputation or standing of MedAccess;
- ▶ serious breaches of MedAccess policies, procedures or Codes of Conduct; and
- ▶ deliberate concealment of any of the above.

¹ **'We are humble:** I acknowledge what I do not know and welcome input; I see feedback as a gift and actively seek it. **We are relentless about rigour:** I ask questions and challenge assumptions; I embrace scrutiny and transparency. **We build trust:** I keep my word and am accountable for my actions; I act to reduce bias and discrimination; I promote respectful and inclusive environments. **We invest in people:** I invest in the emotional wellbeing of others; I seek out diverse views and voices.'

3 Independent Whistleblowing Helpline

To enhance our whistleblowing procedures, MedAccess has engaged Safecall (a Law Debenture company) to provide an independent reporting helpline where necessary and appropriate. This service is available to all staff, as well as interested external third parties, and offers an additional channel for reporting concerns. The aim of the helpline is to provide a mechanism for reporting, investigating and remedying any wrongdoing at MedAccess. By providing multiple channels for reporting concerns, we aim to foster an environment where staff and other stakeholders feel safe and supported in raising issues.

It is not necessarily the first port of call for a report and may not be applicable in all circumstances (see below) but it provides an important anonymous reporting channel to complement other reporting channels where applicable and appropriate.

As well as receiving reports the external helpline offers the following support services:

- ▶ Confidential advice on how to report concerns.
- ▶ Assistance in understanding the whistleblowing process.
- ▶ Emotional support for employees who may be distressed by the issues they are reporting

The independent helpline is not the default option but one of a number of reporting options available:

3.1 Option 1 – Policy Specific Procedures

MedAccess maintains a number of subject-specific policies and procedures which set out their own reporting and complaints procedures. If the nature of a report falls into one of those policies the appropriate procedure should be followed and is not superseded by this policy, which is intended to be complementary. Further explanation is set out below and in the Schedule. Please check with the Compliance Officer if you are in any doubt.

3.2 Option 2 – Line Manager

In the absence of any relevant specific procedure or direction, reports should be made to your line manager in the first instance for further investigation. This may be done either verbally or in writing. Your concern may be escalated to appropriate parties if your concern does not implicate such parties. A decision will then be taken as to who is best placed to investigate and resolve the matter.

3.3 Option 3 - Appropriate Parties

If there is no prescribed reporting procedure and you feel reporting to your line manager is not feasible, is inappropriate or you feel uncomfortable in doing so for any reason (including if you have concerns about their involvement), or the response received is unsatisfactory, you can report the concern directly to an appropriate person or officer for further investigation. For instance a safeguarding matter would usually be reported to the Safeguarding Officer, a breach of financial

controls to the CFO, a data breach to the Data Protection Officer and a matter of business integrity to the General Counsel or Money Laundering Reporting Officer.

3.4 Option 4 – Safecall

If a staff member wishes to make a disclosure or raise a concern under this reporting mechanism and either:

- (a) does not feel comfortable or satisfied using prescribed procedures set out in normal MedAccess policies; or
- (b) does not feel comfortable using normal reporting lines within MedAccess' organisational structure; or
- (c) has attempted to use such reporting lines and has been frustrated,

they may prepare a whistleblower report detailing their concerns using Safecall. The report should describe the details of the misconduct or malpractice clearly and with as much detail as possible and may be provided on an anonymous basis.

You can make a report by freephone:

UK 0800 915 1571

HK 3077 5524

Ireland 1 800 812 740

USA 866 901 3295

or www.safecall.co.uk/report.

This service is available twenty-four (24) hours a day and seven (7) days a week. Reports may also be made anonymously to Safecall, in which case MedAccess will not find out the identity of the person who raised the concern.

3.5 Whom Will Safecall Notify?

Safecall will inform a nominated appropriate party that a report has been received. If the allegations relate to a nominated appropriate party, Safecall will notify a reserve. To the extent that reports relate to all nominated appropriate parties Safecall will inform the Chair of the Board of Directors. A decision will then be taken as to who is best placed to investigate and resolve the matter. Safecall will only reveal the identity of a reporter if they give their consent.

4 Investigation

All disclosures and concerns reported via any whistleblower channel will be reviewed by the appropriate party as soon as practicable after their receipt to evaluate the course of action.

The engagement of the external helpline does not therefore alter the fundamental principles of our investigation process. However, it introduces the following enhancements:

- ▶ **Independent Oversight:** The external provider offers an independent perspective, ensuring objectivity in handling reports.
- ▶ **Enhanced Support:** The helpline provides additional support to whistleblowers, which may facilitate more comprehensive investigations.

At an appropriate time the relevant Board Committee may be informed of the progress of any subsequent investigation, maintaining confidentiality and maintaining anonymity where required. All disclosures and concerns will be investigated by the appropriate party who will seek internal and external advice and assistance in completing a prompt investigation of the facts where the situation requires it.

In some circumstances, and where the reporter has chosen to disclose their identity, an individual may be requested to provide additional information and/or attend a meeting to provide further information in order for a concern to be progressed further. Staff members may be accompanied by a colleague at any meeting about a disclosure should they so wish. Equally an individual may maintain their anonymity should they wish to do so, recognising the limitations this may place on any investigation.

Should the disclosure or concern relate to a staff member, the staff member will normally be informed of the allegations as soon as appropriate during any formal investigation and will have the opportunity to provide their inputs during the investigation. However, in some cases, it may not be possible for those investigating to do this e.g. where the integrity of the investigation may be compromised. The staff member is under a duty to co-operate with the investigation and may engage legal counsel at their own cost to represent them in the investigation proceedings. Where a disclosure concerns the appropriate party and no alternative officer is available then the Chair of MedAccess' Audit and Compliance Committee, Governance & Nominations Committee or People & Remuneration Committee (as appropriate) will conduct the review and report to MedAccess' Board of Directors.

MedAccess is committed to ensuring that all disclosures and concerns raised are dealt with appropriately, consistently, fairly and professional.

Individuals who raise disclosures or concerns under this reporting mechanism will be advised of the progress of the investigation and applicable timescales where possible and appropriate, subject to applicable legal constraints. Information provided in relation to any such investigation and/or outcome should be treated as confidential information.

Any staff member who believes that they have subject to interference, threats, reprisals, retaliation, coercion or intimidation because they have raised a concern under this reporting mechanism should inform the appropriate person immediately. MedAccess will treat any such treatment of a staff member as a serious disciplinary matter.

5 Confidentiality and Data Protection

The use of the external whistleblowing helpline is subject to strict confidentiality and data protection measures. All reports are handled in accordance with applicable data protection laws, and the identity of the whistleblower will be protected to the fullest extent possible.

The identity of the whistleblower will not be disclosed without their consent, except where required by law.

All data collected through the helpline will be securely stored and only accessible to authorized personnel involved in the investigation.

6 Governance

The Compliance Officer will ensure that appropriate records of matters raised under this reporting mechanism are maintained. In the event reports are received under this mechanism the Audit and Finance Committee or Governance and Nominations Committee may periodically request a report from the Compliance Officer on the workings and effectiveness of the policy on whistleblowing and complaints and any reports received.

MedAccess will endeavour to ensure that the identity of any person making a disclosure or concern is kept confidential and only disclosed on a need-to-know basis. Papers relating to a protected disclosure will be held in a manner consistent with their confidential nature.

7 External Whistleblowers

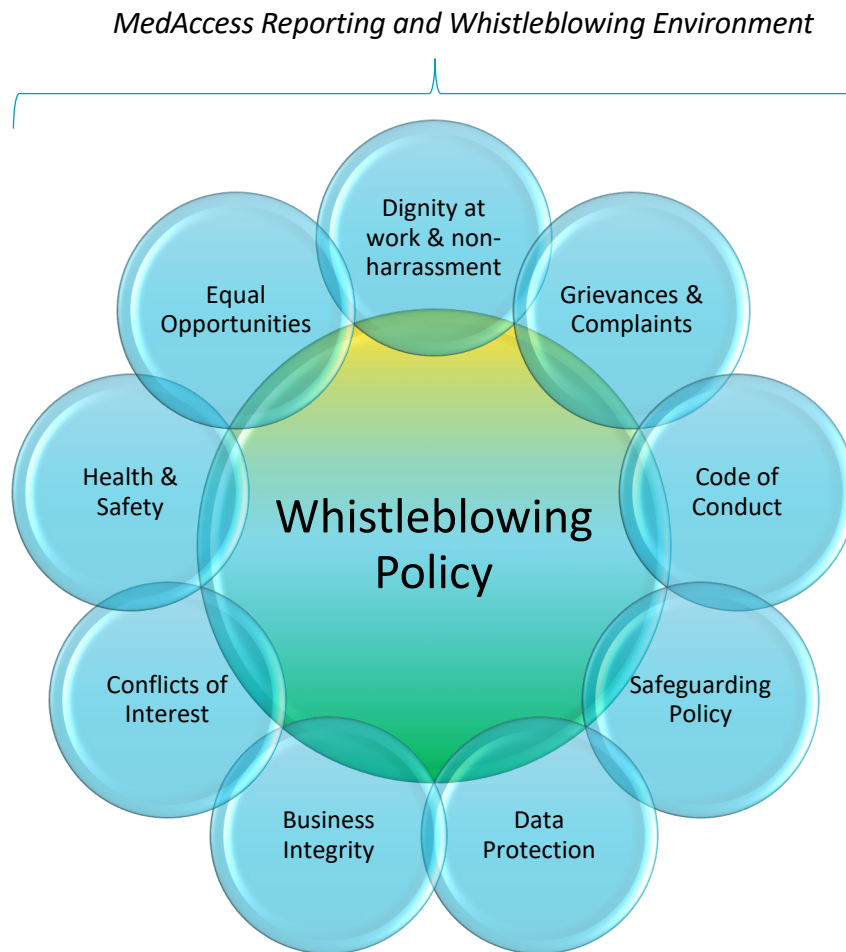
This policy and its helpline extends to external whistleblowers and not simply to members of staff.

External parties, such as vendors, contractors, partners and other stakeholders, are encouraged to report any concerns regarding unethical or illegal activities related to MedAccess's activities. Reports can be submitted through the dedicated whistleblower hotline or secure online reporting portal. These channels are designed to ensure confidentiality and anonymity, allowing external whistleblowers to report their concerns without fear of retaliation. MedAccess is committed to maintaining the highest standards of integrity and transparency, and we value the role that external whistleblowers play in upholding these principles.

Upon receiving a report from an external whistleblower, MedAccess will initiate a thorough and impartial investigation to the same standard as an internal report. The process is designed to protect the whistleblower's identity to the fullest extent possible (if desired by the whistleblower) and to ensure that their concerns are addressed promptly and effectively. Our policy guarantees that all reports are taken seriously and that appropriate corrective actions are implemented when necessary. External whistleblowers will be informed of the outcome of the investigation, provided it does not compromise the confidentiality of the process, the rights of other parties involved or other legal and regulatory obligations of MedAccess.

Our whistleblowing policy will continue to be published on our external website.

8 Mapping the Whistleblowing Policy



8.1 Potential overlap

There is potential overlap with reporting and complaints procedures set out in other MedAccess policies, including those relating to employment matters, for example the Grievances & Complaints Procedure.

The development of this whistleblowing policy and the adoption of an external reporting helpline are potentially helpful for those other policies, but this policy complements and supplements existing complaints and reporting procedures and **does not displace** them. Nor does it prevail over bespoke reporting procedures which are often designed in accordance with the discrete areas of tailored law and regulation. In the case of the Grievances & Complaints procedure it is based on the Acas Code of Practice on Disciplinary and Grievance Procedures applicable in the UK.

Whistleblowing policies are intended to handle general or specific disclosures of wrongdoing which do not necessarily involve or affect the reporter but may have been observed. Such disclosures often require safeguards to preserve confidentiality while on the other hand. In contrast, the Grievance and Complaints procedure is intended to deal with situations affecting the complainant or 'whistleblower' personally.

This reporting process should not be used by staff to raise complaints in relation to their own individual circumstances, including their treatment at work. Complaints of this nature should generally be raised via MedAccess' Grievances and Complaints Procedure. Although the provision of a third-party whistleblowing helpline does provide another channel as a last resort or as a channel for initial registration of a concern where confidentiality is desired, the identity of the complainant will ultimately require disclosure in order to effectively investigate and resolve a complaint.

8.2 Distinguishing and coordinating other MedAccess policies

The Schedule provides signposts and explanations as to when to apply procedures relating to specific operational areas as set out in other MedAccess policies and when to follow this policy, and when and how they interact. This aims to help staff know the appropriate route to take regarding a particular matter. MedAccess recognises these issues can become entangled, for example, where a member of staff's personal grievance raises wider issues such as health and safety.

The distinction is important since workers have a statutory right to be accompanied by a colleague in disciplinary or grievance hearings, but this right may not arise in relation to issues covered exclusively under this policy.

If a staff member is unsure as to the right course, this should be raised with the General Counsel who will provide guidance.

9 Reporting to external authorities

In most cases you should not find it necessary to alert anyone externally, particularly given the provision of an independent reporting channel through Safecall. MedAccess nevertheless recognises that there may be circumstances where staff may feel they wish to report matters to outside bodies such as a regulator or the police, for instance if they feel that a matter has not been (or will not be) properly addressed within MedAccess or has been (or will be) covered up. MedAccess supports the work of the whistleblowing charity Protect and encourages staff to speak to them for confidential advice in such circumstances. Protect can be contacted via their confidential helpline +44 (0) 20 3 117 2520 or their website is at: <https://protect-advice.org.uk>

 GovCo
  PremCo
  AFC

Schedule – Mapping MedAccess Reporting and Whistleblowing Mechanisms

Document Title	Purpose of the Policy	How is a Report or Complaint Made?	Who is the Report or Complaint Made to?	Is Anonymity of the Reporter or Complainant Preserved?	Does the Whistleblowing Policy and Helpline now provide an alternative reporting channel?	How is the Complaint or Report Resolved?
Whistleblowing Policy (May 2025)	Designed to allow and encourage staff and external third parties to report illegal, unsafe or unethical activities. It typically covers issues that affect the organization as a whole or have significant legal, ethical or policy implications	Via one of four channels (see above) including those provided in other MedAccess policies and procedure, and the independent Whistleblowing helpline	See previous and above, but centrally addresses reports to the independent reporting channel Safecall	Yes, the key function provided by this policy. Provides mechanisms for anonymous reporting in part to reassure the reporter and provide protection from intimidation or retaliation	Yes	Depends on the nature of the report but the protection and anonymity provided by the independent and anonymous channel can help provide an appropriate environment to inform the company and support satisfactory resolution
Grievances and Complaints Procedure (May 2025)	To ensure individual employee complaints or problems affecting them personally receive full and careful attention	Grievances should be set out in writing and given to the Line Manager if possible	Line Manager or (if the subject) their line manager, then formal grievance procedure is invoked in writing to line manager	Usually not applicable or appropriate as the issues are often personal and require direct resolution	Yes, in rare cases where this is desirable and appropriate in the initial stages though since reports do not necessarily involve illegality, unethical behaviour or malpractice and cannot be address without this is not generally applicable. Does not displace the standard procedure	Mediation, investigation, and appropriate corrective actions within the organization. If unresolved, the grievance can be appealed to a panel comprising a member of the Senior Management Team or independent Board member together with the HR Director

Document Title	Purpose of the Policy	How is a Report or Complaint Made?	Who is the Report or Complaint Made to?	Is Anonymity of the Reporter or Complainant Preserved?	Does the Whistleblowing Policy and Helpline now provide an alternative reporting channel?	How is the Complaint or Report Resolved?
Dignity at Work & Non-Harassment Procedure (July 2021)	To provide a working environment free from harassment and intimidation and to prevent unacceptable behaviour	Complaints raised first with individual concerned or if not appropriate /successful with line manager, a colleague or HR. If unresolved formal complaint then made	Line manager and HR	Complaints can be discussed in full confidence but usually on a non-anonymous basis	Yes, in rare cases where this is desirable and appropriate in the initial stages. May also be appropriate for general third-party reports	Informal route is followed by a formal route if unresolved involving the line manager and HR. It may then be appealed internally, with the possible involvement of an outside expert
Equal Opportunities Policy (July 2021)	To provide equal opportunities to all employees and applicants, free from discrimination	Complaints should be raised through the Company's Grievance Procedure	See above	If required and employees are protected from intimidation, victimization, or discrimination	Yes, this option is now available including for general third-party reports but please note comments above	See above
Health and Safety Policy (November 2023)	To maintain a safe working environment and ensure health and safety standards	Health and safety issues should be reported to the Office Manager	Office Manager	Not usually applicable or appropriate	Yes, this option is now available including for general third-party reports regarding non-compliance or malpractice	Office Manager referral to the Senior Management Team, and if necessary the Board
Conflicts of Interest Policy (April 2023)	To identify and manage corporate conflicts of interest	Conflicts should be reported in writing on a Declaration of Interest form or via disclosure against the annual	To the General Counsel and a member of the Senior Management Team with ultimate line	No. Conflicts reports are generally required by the person subject to the potential conflict	Not generally applicable but may be available for third-party reports	The General Counsel consults with the Senior Management Team to record, remedy and mitigate risks

Document Title	Purpose of the Policy	How is a Report or Complaint Made?	Who is the Report or Complaint Made to?	Is Anonymity of the Reporter or Complainant Preserved?	Does the Whistleblowing Policy and Helpline now provide an alternative reporting channel?	How is the Complaint or Report Resolved?
		Code of Conduct certificate	responsibility			
Finance and Controls Policy (April 2022)	To ensure accurate and timely financial information and maintain internal controls	Suspected violations of laws, regulations, policies and controls of MedAccess should be reported openly via normal reporting lines or the whistleblowing helpline	Line manager, CFO or General Counsel, and if those reporting lines are not applicable on an anonymous basis in the first instance via the independent whistleblowing helpline	Not normally but yes if required	Not in the first instance but provides a valuable alternative to ensure the company is kept fully informed of violations	Necessary remedial action depending on the nature of the violation. See also Whistleblowing policy
Data Protection Policy and Procedure(January 2024)	To set out data protection principles and rules for handling personal data	Issues or data breaches should be reported to the DPO via submission of a Data Breach Incident Report Form	Data Protection Officer (DPO) and ultimately ICO	Not usually applicable	If necessary in the first instance but not encouraged. Prescribed procedure is required to be followed	The document does not explicitly provide this information
Safeguarding Policy (March 2024)	To safeguard those who come in contact with MedAccess from harm, abuse, neglect, and exploitation	Concerns should be reported to the Safeguarding Officer	Safeguarding Officer, or directly to the Board or PremCo	Not ordinarily	Yes, this option is now available including for those requiring anonymity, general third-party reports and may be particularly relevant for external reports	The Safeguarding Officer decides on further investigation or action and liaises with statutory bodies as required

Document Title	Purpose of the Policy	How is a Report or Complaint Made?	Who is the Report or Complaint Made to?	Is Anonymity of the Reporter or Complainant Preserved?	Does the Whistleblowing Policy and Helpline now provide an alternative reporting channel?	How is the Complaint or Report Resolved?
Business Integrity Policy (May 2023)	To uphold the highest standards of business integrity and comply with laws and regulations	Suspicious activity should be reported to the MLRO/Compliance Officer (both fulfilled by General Counsel) depending on its nature	Money Laundering Reporting Officer (MLRO) for AML and Compliance Officer for corruption	The document does not explicitly provide this information	Yes, Whistleblowing policy is particularly relevant here and this option is now available including for general third-party reports. May be particularly relevant for external reports	The MLRO or Compliance Officer (General Counsel) considers reports and refers to GovCo or AFC and Board. Potentially makes external reports to the NCA as required
Code of Business Conduct (May 2023)	To ensure compliance with applicable laws and standards and promote business integrity, health, safety, and performance	Non-compliance should be reported to the General Counsel	General Counsel	Reports under the Whistleblowing Policy may be made anonymously	Yes, see Business Integrity Policy above	The Code of Conduct generally interprets the application of other policies (including those listed above) to the individual. Resolution is therefore determined by the applicable policy and also potentially the Disciplinary procedure