



Kallidus Grievance and Whistleblowing Policy

Website Version 5



Kallidus Grievance and Whistleblowing Policy

Overview

Kallidus is committed to conducting its business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect all Kallidus directors, employees and anyone acting on our behalf to do the same and to maintain the highest standards of ethical business behaviour. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential to prevent such situations from occurring and to address them when they do occur.

At Kallidus, we encourage everyone to report any concerns as soon as they arise; such concerns can be of any nature, including any matters in connection with Kallidus personnel, as well as customers, suppliers and other third parties or how we conduct our business.

The principles for supporting Whistleblowing include:

- Encouraging and empowering colleagues and external stakeholders to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Providing guidance as to how to raise those concerns.
- Reassuring colleagues that they will be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- Encourage a culture of openness.
- Ensure compliance for Kallidus with the relevant legislation.

Purpose

Kallidus is committed to openness, integrity, fairness, and accountability. This policy provides **one clear mechanism** for all stakeholders—internal or external—to raise concerns or grievances.

It ensures:

- Concerns are taken seriously and investigated impartially.
- Whistleblowers and complainants are protected from retaliation.
- Concerns are resolved in a timely, transparent, and fair way.



Scope

Applies to all **internal and external stakeholders**, including:

- Employees
- Contractors & subcontractors
- Suppliers & partners
- Customers
- Members of the public affected by Kallidus operations.

This policy is not designed for complaints or support issues related to Kallidus products and/or services. If you have an issue or complaint related to our products or services, please contact Kallidus [Customer Support](#).

Definition

Whistleblowing is the disclosure of information relating to suspected wrongdoing or dangers at work.

Protection for Whistleblowers

In the UK, the [Public Interest Disclosure Act 1998](#), shortened to PIDA, is the law that protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996 (ERA).

What Type of Misconduct Should Be Reported?

Some examples (not exhaustive) of behaviours or suspected wrongdoing include:

- Criminal activity or offences, including fraud, theft, and embezzlement.
- Corruption, bribery or blackmail.
- Financial malpractice, impropriety or mismanagement.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Conduct likely to damage Kallidus's brand or financial reputation.
- Actions which endanger the health and safety of Kallidus personnel or the public.
- The deliberate concealment of information relating to any of the above matters.
- Any retaliation against someone for speaking up or "whistleblowing".



Reporting a Concern

Internal Stakeholders (Employees, Contractors)

- **Line Manager** – report concerns in the first instance.
- **Senior Manager or People Team** – if inappropriate or unresolved.
- **Escalation** – if still unresolved, can escalate externally to a prescribed body or regulator.

External Stakeholders (Customers, Suppliers, Partners, Public)

- **Primary Route:** Submit grievances via the **dedicated web form on [Kallidus.com](https://kallidus.com)**.
- Submissions go directly to the **People Team / Compliance Officer** for review.
- External grievances will be acknowledged, investigated, and resolved following the same fair and transparent process as internal reports.

Grounds for Reporting

Reports will be accepted if they involve:

- Suspected wrongdoing (fraud, bribery, corruption, safety breaches, misconduct)
- Unlawful or unethical conduct
- Breach of policy, contractual obligations, or regulatory requirements
- Issues of fairness, discrimination, safety, or ethical conduct
- Valid dissatisfaction with Kallidus's decisions, actions, or omissions

Process Steps (for both internal & external concerns)

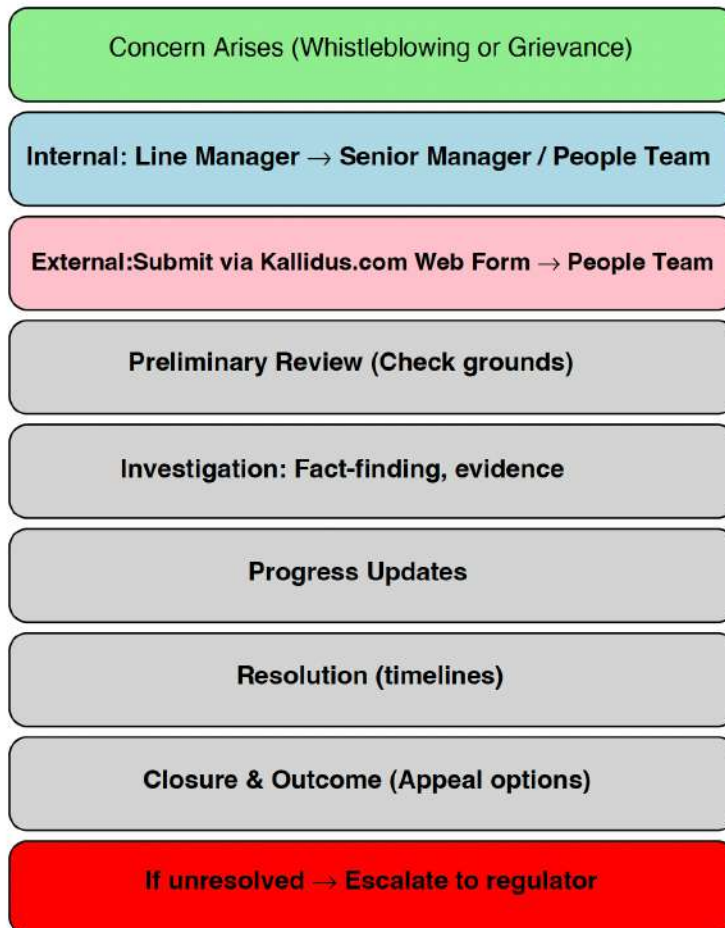
1. **Submission** – via line manager, People Team, or [external website form](#).
2. **Acknowledgement** – promptly (where contact details are provided).
3. **Preliminary Review** – assess if the concern meets grounds for investigation.
4. **Investigation** – impartial fact-finding (interviews, document review, evidence gathering).
5. **Progress Updates** – complainant/whistleblower kept informed at key stages.
6. **Resolution** – aim to resolve within communicated timelines.
7. **Closure** – formal outcome shared, with appeal options if applicable.



8. **Escalation** – if unresolved, external whistleblowing cases can go to prescribed bodies/regulators.

Kallidus Unified Reporting Process

Whistleblowing & Grievance Reporting Flow



Confidentiality & Protection

- All reports are handled **confidentially** and stored securely (GDPR-compliant).
- Anonymous submissions are permitted via the [website form](#).
- No one will suffer retaliation, harassment, or victimisation for raising a genuine concern in good faith.

Record Keeping

- All concerns logged, investigated, and retained in line with data protection and retention policies.



Review

- This policy is reviewed **annually** or sooner if required by law or operational changes.

Our Commitment Against Retaliation

Kallidus will ensure that genuine concerns can be raised without fear of retaliation and will not affect the continued employment, work or career with Kallidus of the person who raised their concerns. This applies to both internal and external stakeholders.

Some examples of retaliation that are not acceptable include:

- Termination of contracts
- Blacklisting
- Harassment
- Legal threats
- Denial of services

Kallidus will not tolerate harassment, victimisation or retaliation towards any person for raising concerns on the basis of a reasonable belief or objecting or refusing to participate in any act or practice that they honestly believe to be in violation of law or misconduct. This extends to employees, contractors, suppliers, partners and customers.

Any such harassment, victimisation or retaliation will be treated as very serious and will be a disciplinary offence in accordance with Kallidus's procedures.

If an external whistleblower is identified and someone within the organisation retaliates against them, the consequences would be serious, clear, and consistently enforced – both to protect the whistleblower and deter future misconduct.

Here are examples across different consequence categories:

- Disciplinary consequences for employees/ individuals
- Contractual & Business Consequences

These apply to business partners, suppliers, or contractors found guilty of retaliation:

- Termination of supplier/service agreement
- Exclusion from future bids or tenders with the company
- Financial penalties or withholding payments if contract terms prohibit retaliation



- Legal & Regulatory Consequences

Depending on the jurisdiction, retaliation could trigger:

- Civil lawsuits brought by the whistleblower (damages for harm caused)
- Regulatory investigations (e.g., by the UK's FCA, HSE, or ICO, or under the EU Whistleblower Directive)
- Criminal liability in cases involving intimidation, threats, or coercion
- Fines or sanctions imposed by government bodies

- Organisational Consequences

- Mandatory Ethics & Compliance retraining for teams or individuals where retaliation occurred
- Disciplinary measures, where applicable.

Glossary of Terms

Prescribed Person - The Prescribed Persons Order 2014 sets out a list of over 60 organisations and individuals that a worker may approach outside their workplace to report suspected or known wrongdoing. The organisations and individuals on the list have usually been designated as prescribed persons because they have an authoritative or oversight relationship with their sector, often as a regulatory body. An up-to-date list can be found [here](#).