

# Whistleblowing Policy

## 1. About this policy

- 1.1. Invinity Energy Systems (“Invinity”, “we”, “us”) is committed to conducting its business with honesty, integrity and high standards of openness and accountability. We expect everyone working with or for us to maintain these standards. Any suspected wrongdoing or danger should be reported as soon as possible.
- 1.2. This policy applies to all employees, officers, directors, consultants, contractors, casual workers, agency workers, and any other individuals performing services for or on behalf of Invinity (“staff”).
- 1.3. This policy provides an internal mechanism for reporting concerns and is consistent with the principles of the UK Public Interest Disclosure Act 1998 and international governance best practice. It does not form part of any employee’s contract of employment and may be amended at any time.

## 2. What is whistleblowing?

- 2.1. Whistleblowing is the reporting of suspected wrongdoing or dangers relating to Invinity’s activities. Examples include:
  - Criminal activity (including bribery, fraud or corruption)
  - Breaches of legal or regulatory obligations
  - Miscarriages of justice
  - Health and safety risks
  - Environmental damage
  - Financial or tax irregularities
  - Breaches of internal policies or professional obligations
  - Concealment of any of the above
- 2.2. Disclosures may relate to past, present or potential future wrongdoing.
- 2.3. Personal grievances (such as issues relating to an individual’s employment) are not normally covered by this policy and will be addressed under the grievance procedure.

## 3. How to raise concern

- 3.1. Where possible, concerns should first be raised with your line manager.
- 3.2. Where this is not appropriate, concerns may be raised with the Whistleblowing Officer or a Whistleblowing Representative.
- 3.3. A meeting will be arranged as soon as possible to discuss the concern. You may be accompanied by a colleague or representative, who must maintain confidentiality.

## 4. Handling, Escalation and Investigation of Concerns

- 4.1. All concerns will be logged by the Whistleblowing Officer
- 4.2. The Whistleblowing Officer will conduct an initial assessment to determine scope and appropriate steps.

- 4.3. Where a concern appears genuine, material or serious, the Whistleblowing Officer must escalate it to the Chair of the Audit & Risk Committee without undue delay.
- 4.4. Investigations will be conducted fairly, proportionately and, where necessary, independently.
- 4.5. The Audit & Risk Committee Chair will receive periodic summary reports of whistleblowing activity, including themes, actions taken and recommendations.

## 5. Confidentiality

- 5.1. We will make every effort to maintain confidentiality and only disclose identities where necessary to investigate the concern or comply with legal obligations
- 5.2. Completely anonymous disclosures will be reviewed to the extent reasonably possible.

## 6. External Disclosures

- 6.1. This policy aims to provide an internal mechanism for raising concerns. In most cases, external reporting should not be necessary.
- 6.2. Staff are encouraged to seek advice before reporting a concern externally.
- 6.3. Independent advice is available from Protect (formerly Public Concern at Work)

## 7. Protection and Support for Whistleblowers

- 7.1. Whistleblowers who raise genuine concerns will not suffer any detrimental treatment.
- 7.2. Detrimental treatment includes dismissal, disciplinary action, demotion, threats, harassment, or victimisation.
- 7.3. Retaliation against whistleblowers is prohibited and may lead to disciplinary action.
- 7.4. Malicious or knowingly false allegations may result in disciplinary action.

## 8. Contacts

### Whistleblowing Officer:

Angie Williams, HR Director  
[awilliams@invinity.com](mailto:awilliams@invinity.com)

### Whistleblowing Representative:

Louise Henry, UK HRBP  
[lhenry@invinity.com](mailto:lhenry@invinity.com)

### Chair of the Audit & Risk Committee:

Dr Margaret Amos  
[mmamos2017@gmail.com](mailto:mmamos2017@gmail.com)

### Protect – Independent Whistleblowing Charity

Helpline: 020 3117 2520  
Website: <https://protect-advice.org.uk>

Our Whistleblowing Policy will be reviewed annually.