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1.0	July 2024	New Issue following rebranding and review	SBR	RWdS	TI

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SafeLane Global

This document applies to the all Employees, Contractors, Agents, Partners, Officers, and Directors etc. of the business (Covered Persons), of **SafeLane Global**, including **SafeLane Global Limited, SafeLane Global Middle East LLC-FZ, SafeLane Global International Limited** and all **Subsidiaries and Affiliates**.

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WHISTLEBLOWING POLICY

1 SAFELANE GLOBAL VALUES AND WHISTLEBLOWING

SafeLane Global's Values are the standards to which we hold ourselves accountable and are those of

- Integrity,
- Passion,
- Quality, and
- Professionalism.

To enable us to be held accountable to these values we encourage stakeholders to make a "qualifying disclosure" (see definitions below) of any perceived or actual misconduct which is in the public interest by the means outlined in this procedure.

This document is designed to assist SafeLane Global in

- encouraging and facilitating reporting of wrongdoing;
- supporting and protecting whistleblowers and other interested parties involved;
- ensuring reports of wrongdoing are dealt with in a proper and timely manner;
- improving organisational culture and governance; and
- reducing the risks of wrongdoing.

And will benefit SafeLane Global, its staff at all levels, external stakeholders, including investors, clients and the communities we serve, by:

- allowing the organisation to identify and address wrongdoing at the earliest opportunity;
- helping prevent or minimize loss of assets and aiding recovery of lost assets;
- ensuring compliance with organizational policies, procedures, and legal and social obligations;
- attracting and retaining personnel committed to the organization's values and culture;
- demonstrating sound, ethical governance practices to society, markets, regulators, owners and other interested parties.

The email address for reporting of disclosures is whistleblowing@safelaneglobal.com.

2 SCOPE

Whistleblowing is when someone makes a report of suspected past, present or imminent wrongdoing, or an attempt to conceal wrongdoing that comes under the definition of a qualifying disclosure (see below). Officially this is called 'making a disclosure in the public interest'.

It is immaterial whether the relevant failure occurred, occurs or would occur in the United Kingdom or elsewhere, and whether the law applying to it is that of the United Kingdom or of any other country or territory.

Two classes of person may make reports:

2.1 Covered persons

An Employee (whether current or ex-), Contractor, Agent, Partner, Officer, or Director of SafeLane Global are classes as Covered Persons.

In the UK, the reporting of wrong-doing(s) under this policy may be covered by the Public Interest Disclosure Act 1998 (the Act) or the Employment Rights Act 1996 as amended (ERA). Other jurisdictions have their

own equivalent laws, and where they do not, SafeLane Global will adhere to PIDA or the ERA as if it did apply in that jurisdiction.

2.2 External Stakeholders

Generally speaking, in relationship to SafeLane Global, individual external stakeholders (who are not protected by law) would fall into one of the following categories:

- members of the public
- genuinely self-employed
- a volunteer with no enforceable employment contract, or
- a non-executive director
- employees of companies, agencies or NGOs with whom we have a business relationship.

However, SafeLane Global would still welcome any disclosures they feel they need to make and so would encourage them to follow the process in 5.2 External Stakeholders below.

3 QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the person making the report genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- Criminal offence;
- Unlawful acts;
- Improper and/or unethical behaviour;
- Endangering the health or safety of any individual;
- Miscarriage of justice;
- Financial malpractice, impropriety or fraud;
- Mishandling or risks to data and/or information;
- Failure to comply with a legal obligation;
- Breaches of Human Rights (e.g. Anti-slavery or human trafficking)
- Threats or harassment; or
- Deliberate concealment of any of the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

Employees must reasonably believe that the disclosure is “in the public interest”. SafeLane Global encourages you to use the procedure to raise any such concerns.

A disclosure of information is not a qualifying disclosure if the person making the disclosure commits an offence by making it (e.g. by hacking into a computer), or it is for personal gain.

4 NON-QUALIFYING DISCLOSURES

Should the concern not meet the requirement to be a qualifying disclosure, employees should raise this under the Company's grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e., it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

Examples of non-qualifying disclosures include:

- Rates of Pay
- Administration
- Field-based discipline
- Conflicts between workers.

Reports such as these should be made, and will be dealt with, according to our grievance procedure

5 CONFIDENTIALITY

All reports will be kept confidential unless the person making the disclosure does not withhold their identity or requires anonymity (open whistleblowing). The person making the disclosure is entitled to maintain their anonymity (confidential whistleblowing) and where possible this will be maintained and will not be disclosed to others except on a 'need to know' basis and with the whistleblower's consent, or as required by applicable law. Anonymous whistleblowing is where information is received without the whistleblower disclosing their identity, but there may be difficulties arising from this. For example, feedback may not be possible if the company is unaware of who made the disclosure, and the matter may not be fully dealt with if SafeLane Global is unable to contact the person making the disclosure. In extreme cases evidence may need to be given in court by the whistleblower.

It should be noted that any confidentiality clause included in a settlement agreement will not be effective in a whistleblowing situation.

6 HOW TO REPORT

6.1 Covered Persons

If you are one of the people classed as an Employee, Contractor, Agent, Partner, Officer, or Director of the business (Covered Persons), of SafeLane Global, in the first instance you should report any concerns you may have in writing, or by email, to your line manager. Where the concern relates to your line manager, or it is not appropriate to make the report to your line manager, you may also contact Human Resources. You may also report your concerns by using the confidential email address whistleblowing@safelaneglobal.com. All concerns reported will be treated in the utmost confidence. You will be asked to confirm any verbal concerns in writing.

6.2 External Stakeholders

External stakeholders are encouraged to report any misconduct via the email address whistleblowing@safelaneglobal.com. This group may include, but is not limited to:

- Non-Executive Directors
- Suppliers,

- Customers (or any of their respective employees),
- Non-Governmental Organisations (NGOs), and/or
- Members of the communities where SafeLane Global operates.

External stakeholders who have concerns, issues or complaints of a commercial rather than ethical nature are invited to address them to their appropriate business contact within SafeLane Global. Any concerns that are reported to the whistleblowing email address that are outside the scope of this policy will be redirected to the appropriate channel and will not be the subject of any whistleblowing investigation.

6.3 Prescribed People and Bodies

As a protected person, if you do not want to report your concerns to your line manager or Human Resources or via email, or as an external stakeholder via email, you can take them direct to the appropriate organisation or regulatory body with authority for that area. In the UK these are called Prescribed People and Bodies and details for such individuals and organisations, such as the

- Director of the Serious Fraud Office,
- the Information Commissioner,
- the Environment Agency
- the Equality and Human Rights Commission; and
- Health and Safety Executive,

can be found [here](#).

7 INVESTIGATIONS

Following receipt of a disclosure by SafeLane Global made under this policy, an investigation meeting will be held with the person making the report if they have provided contact details. This meeting may be in person or on-line and the purpose of this meeting is to gather as much information as possible from person who has made the disclosure regarding their concerns, including whether they have any supporting evidence or can identify any witnesses.

The whistleblower is entitled to be accompanied during any meetings or discussions about the disclosure, and the need for confidentiality of all parties will be discussed at the opening of any such meetings or discussions,

After this meeting, the investigating manager will then commence a full investigation into the concerns raised. The investigation manager will put together an investigation team with the appropriate levels of competence and understanding of the issues raised and the team will gather all relevant information including relevant documentary evidence or witness statements. The investigating manager may retain and/or consult with external auditors, external legal counsel and other experts, on a confidential basis, as necessary to investigate and resolve the complaint taking into account all information and advice received both internally and externally.

Once the investigation is complete, the investigation manager will generally report the findings and conclusion(s) reached to the whistleblower (if known) confirming the outcome.

Quarterly reports of disclosures received and their findings, or the number of on-going investigations underway at the time of the report, will be made to the Board of Directors of SafeLane Global.

If the employee is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body (see Prescribed People and Bodies (6.3. above). Alternatively, employees may raise a formal complaint under the Company's grievance policy.

8 FORMAL ACTION

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

9 PROTECTION AGAINST DETRIMENTAL TREATMENT

No person who, honestly and in good faith, makes a disclosure under this whistleblowing policy shall suffer reprisals or retaliation of any kind, including threats or harassment, or in the case of Covered Persons, any form of adverse employment action such as dismissal, demotion, suspension. Threats or compensation decreases. The right of the whistleblower to protection against retaliation does not, however, include immunity for any personal misconduct in which the whistleblower may have been involved.

Bullying, harassment, or any other retaliation afforded to a colleague who has made a qualifying disclosure is unacceptable and should be reported immediately in accordance with this policy. Anyone found to have acted in such a manner will be subject to disciplinary action.

If a concern is raised in the belief that it is in the public interest to do so, but a subsequent investigation confirms this not to be the case then no action will be taken against the employee who has raised a concern.

If an employee acts in bad faith or raises vexatious, malicious or knowingly untrue concerns in order to harm colleagues or Safelane Global however, this will result in disciplinary action which may lead to dismissal.


Tim Illingworth – CEO

JULY 2024