

Non-retaliation policy

1. Purpose

Edenreach does not tolerate any form of retaliation against any person who reports a suspected violation in good faith.

Employees are encouraged not to shield their problems, but instead bring them immediately into the light of day. The purpose of this Policy is to protect from retaliation any associate who complies with our procedures and policies in order to bring forth irregularities that may be occurring within our organisation.

2. Retaliation definitions

The following are examples of what might constitute intolerable retaliation:

- Suspension, lay-off, dismissal or equivalent measures;
- Demotion or withholding of promotion;
- Transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- Withholding of training;
- A negative performance assessment or employment reference;
- Imposition or administering of any disciplinary measure, reprimand, or other penalty, including a financial penalty;
- Coercion, intimidation, harassment or ostracism;
- Discrimination, disadvantageous or unfair treatment;
- Failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment;
- Failure to renew, or early termination of, a temporary employment contract;
- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- Early termination;
- Psychiatric or medical referrals; or
- Any other circumstantial form of retaliation that can be imposed on an employee.

3. Policy

- Regardless of whether the suspicion proves to be well placed, employees who disclose a potential legal or ethical compliance breach or conflict of interest in good faith will not face retaliation, disciplinary action, or other negative employment consequences;
- Any employee who intentionally reports a breach of the law, an ethical rule, or a conflict of interest will not be protected under this policy, and may face repercussions;
- Nothing in this Policy should be read as absolving any associate from their own misconduct or shielding them from punishment if they self-report their wrongdoing. Nonetheless, when assessing what disciplinary action should be taken against a reporting employee, the fact that the employee self-reported their own misconduct shall be taken into account;
- Every employee is responsible for ensuring compliance with this Policy.

4. Reporting and procedures

Any employees who reasonably believes that they or a colleague have been subject to retaliation due to their disclosure of a legal or ethical compliance violation or potential conflict of interest, should, with no hesitation, report this to their line manager or Human Resources Department.

Employees who are afraid that their report will not be handled properly can anonymously contact the Protect confidential helpline at 0203 117 2520 or email at whistle@pcaw.co.uk.

Any employee who will be found guilty of violating this Policy shall be subjected to disciplinary action in accordance with our disciplinary procedure.

If you have any concerns or questions regarding this policy don't hesitate to reach out to our Compliance Officer.

This policy shall be reviewed no later than 2 years from policy approval.

Name:

Position:

Date:

Signature:

Review date: