

# RWS Group

## Speak-up Policy

Raising concerns or seeking advice on issues related to the RWS Code of Conduct

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**Approver:** Jane Hyde / Jim McHugh

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## 1 Document history

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## 2 Ancillary documents

This Speak-up Policy ("Policy") should be read in conjunction with the RWS Code of Conduct.

## 3 Introduction

RWS Holdings plc (together with its affiliates and subsidiaries, "RWS" or the "Group") is committed to operating its business in accordance with the highest standards. In doing so, it recognizes the importance of ensuring that colleagues have a clear, defined process to raise any genuine concerns regarding suspected breaches of, or questions about, any aspect of the RWS Code of Conduct (or any associated policies).

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RWS has its corporate head office in the UK, is publicly listed on the Alternative Investment Market (AIM) of the London Stock Exchange and its policies are compliant with English Law as a minimum requirement. For those jurisdictions in which RWS operates, and there is a higher threshold of requirements, those legal requirements will govern locally.

## 4 Scope

This Policy applies to all RWS permanent and short-term employees, consultants, contract staff and secondees (“Colleagues”).

## 5 Purpose

RWS aims to create an environment whereby Colleagues are able to raise any genuine concerns regarding suspected breaches of, or questions about, any aspect of the RWS Code of Conduct (or any associated policies), without any fear of retaliation, discrimination, disciplinary action or of being disadvantaged in any way. The purpose of this policy is to encourage reporting of any suspected wrongdoing as soon as possible, to provide guidance on how to raise concerns and to give details about the process.

If you believe that a provision of the RWS Code of Conduct has been or is being breached, you have a responsibility to raise your concerns promptly with someone who can deal with the situation. Ideally this should be your line manager or another senior manager, but you may not always feel this is appropriate or desirable, in which case you can use the Navex reporting process (see below). This also applies if you have a question or need clarification about any aspect of the Code of Conduct. It is important that you can be confident you are doing the right thing.

This Policy is not a substitute for RWS’ HR grievance processes. Please use our grievances processes if you feel you are not being treated fairly.

Matters which could constitute a breach of the Code of Conduct include (but are not limited to):

- Financial corruption (such as fraudulent record keeping or accepting or offering bribes or other incentives in order to obtain a contract or preferential status).
- Breaches of RWS’ confidentiality, data privacy and information security policies (e.g. unauthorised disclosure of personal data or saving confidential/proprietary data onto a USB stick).
- Anti-competitive behaviour (e.g. agreeing with a competitor to operate only in a specific regional area).
- Property offences (e.g. theft of IT equipment).
- Systematic bullying or discrimination.
- Negligent acts or omissions which could impact the health and safety of employees.

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## 6 Reporting concerns

You are encouraged to raise any concerns or questions internally in the first instance and can do that through a number of channels:

- with your line manager
- with another senior manager

with a member of the HR or Legal teams

This can be done either verbally or in writing. Anyone who is approached for assistance with a concern or question has a duty to make sure that the matter is followed up and resolved.

In the event that you are not comfortable following the internal route, you can raise your concern via the confidential Navex process. Navex is our independent third-party reporting provider. Colleagues can contact Navex via their dedicated RWS [webpage](#). Colleagues are encouraged to provide their name and contact details in order for the investigation team to carry out the necessary review of the allegation, although you can remain anonymous if you prefer. Do note that proper investigation of anonymous reports may be more difficult or impossible if we cannot obtain more information from you.

Any Colleague or RWS Third Party who reports their concerns in good faith will be protected and will not be penalized. Any act or threat of retaliation will be considered a serious breach of the Code of Conduct and must be reported.

However, if you knowingly make a false allegation or provide false information you may be subject to disciplinary action.

## 7 Process

RWS is committed to ensuring that all reported concerns are taken seriously and processed in a swift manner. The investigation procedure under this Policy is as follows:

- The General Counsel and Company Secretary, the Chief People Officer and the Head of ESG (together, the “Committee”) will review any report filed through the above channels and will then allocate the right member of the Committee to chair consideration of the matter.
- If you have asked a question, the Committee will come back to you with an answer as soon as practicable.
- If you have raised a concern, the Committee will confirm how the matter will be handled.
- The Committee will assess the situation and determine whether it can be resolved by agreed action or whether it warrants an investigation, in which case an investigating manager will be appointed. If a decision is made not to investigate, you will be given the reasons for this decision.
- The investigating manager will lead any investigation and may seek to contact you if further details are required to help with the investigation. Some investigations may

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involve external parties such as external lawyers, auditors or in certain cases the police

- Upon conclusion of the investigation (as determined by the Committee), the investigating manager will complete a report of the findings, together with any specific recommendations or remediation plan, if applicable.
- The Committee, will then approve any applicable plan of action. If a breach of laws or policies is proven, appropriate action will be taken.
- The person raising the concern will be advised of the outcome of an investigation, unless this is not possible due to legal restrictions or if they have chosen to remain anonymous.
- All concerns raised, together with the assessment made by the Committee and the outcome of any investigation, will be reported to the Audit Committee.

## 8 Protection for those raising concerns

Colleagues raising concerns are encouraged to provide their name and contact details in order for any investigation team to carry out the necessary review. RWS will make every effort to protect their identity if they do not want their name disclosed. However, this may not always be possible, as an investigation may have to reveal the source of the information as part of any legal process and a statement may be a necessary part of the evidence.

RWS is committed to protecting persons raising concerns from any harassment, victimization or retaliation in any form. RWS will not tolerate such behaviours and will treat this as a serious breach of the Code of Conduct resulting in disciplinary action.

However, RWS will not condone malicious allegations without substance, and if you knowingly make a false allegation or provide false information, you may be subject to disciplinary action.

Sometimes people have a genuine concern which turns out to be incorrect. While we try to minimise the impact on any person against whom an allegation has been made, it should be recognised this will not always be within the Group's control.

## 9 Retention of violation reports

All reports received shall be retained for a period of three (3) years, after which the reports shall be archived and preserved as required by applicable law.

## 10 Policy review

This Policy is available on the RWS Group intranet. The Policy will be reviewed on an annual basis to ensure compliance with regulatory requirements.

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