

WHISTLEBLOWING POLICY STATEMENT

IM Group is committed to doing business in accordance with our company values. We encourage a culture of openness and want our people to voice their concerns on issues such as unsafe or inappropriate behaviours, breaches of bribery or corruption (as set out in our policy) in a responsible and effective manner.

This statement summarises our policy concerning how employees can report concerns, the protection and support provided to those that speak up and the transparent and confidential process for dealing with these concerns.

We will:

- Ensure appropriate whistleblowing processes are available for all employees and supply chain within IM Group and its subsidiary businesses to report issues in a confidential way.
- Communicate the whistleblowing processes to all employees and supply chain to encourage them to speak up.
- Ensure all concerns raised are treated fairly and properly.
- Treat all disclosures in a confidential and sensitive manner.
- Deal with investigations in a prompt and timely manner.
- Increase awareness amongst employees and supply chain of the types of unsafe or inappropriate behaviours, breaches of bribery or corruption or malpractice scenarios which may give rise to a report to be made.
- Communicate to the IM Group Board any reports or disclosures, the investigation and outcome.
- Not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Promote a culture of openness and transparency across IM Group businesses to encourage employees and their supply chain to speak up.

This policy applies to IM Group and its subsidiary businesses, employees, and supply chain. It meets with legislation, is publicly available and supported by guidance, training and awareness.

Signed

A handwritten signature in black ink, appearing to read 'Gary Hutton', with a stylized flourish at the end.

Gary Hutton

Executive Director

May 2021