

As Group Managing Director, leading the members of the Board of Directors of the SWGR Group of Companies, I am committed to ensuring that the SWGR Group have an avenue to report any wrong doing under the guidelines of this policy and are committed to maintaining the highest standards of honesty, openness and accountability .

Employees will usually be the first to know when someone inside or connected with an organisation is doing something illegal, dishonest or improper, but may feel apprehensive about voicing their concerns. The Board does not believe that it is in anyone's interests for employees with knowledge of wrongdoing to remain silent.

This sets out SWGR's policy on Whistleblowing and is supported by a procedure, which details further how we will achieve this and is maintained within the management system which can be viewed or requested.

The whistleblowing policy statement is intended to act as a deterrent to fraud or other corruption or serious malpractice; it is also intended to protect the business and our reputation.

SWGR takes all malpractice very seriously, whether it is committed by an employee, supplier, customer, competitor or contractor.

This policy statement applies to all permanent and temporary employees, agents and contractors.

It is intended to complement statutory protection and, for the avoidance of doubt, statutory rights will not be affected in any way by this policy.

The following examples demonstrate what we mean by serious malpractice :

- Fraud, corruption, bribery or other malpractice which could lead to a financial loss to the Group
- Criminal offences, eg. Theft, Drug taking,
- Breaches relating to the accuracy or integrity of the Group's financial statements;
- Failure to comply with legal obligations
- Actions which are intended to conceal any of the above.

All concerns reported will be acted upon.

**Signed:**



**Raj Sinha**  
**Group Managing Director**