



Whistleblowing Policy

1. Introduction

Pure Communications Group is committed to upholding the highest standards of ethical conduct and integrity in all aspects of its operations. As part of this commitment, we encourage employees, contractors, vendors, customers, and other stakeholders to report any suspected misconduct, unethical behaviour, or illegal activities within the organization. This Whistleblowing Policy outlines the procedures for reporting concerns and ensures that whistleblowers are protected from retaliation.

2. Scope

This policy applies to all employees, contractors, vendors, customers, and other stakeholders associated with Pure Communications Group.

3. Reporting Procedure

Employees are encouraged to report any concerns or suspicions of misconduct, unethical behaviour, or illegal activities through the following channels:

- Directly to their immediate supervisor or manager (or in the case of other stakeholders, the most senior point of contact they may have within Pure Communications Group);
- To the HR department or Finance Director; or
- To our non-Executive Director.

Reports should include as much detail as possible, including dates, times, individuals involved, and any supporting evidence or documentation.

All employees will have individual and confidential access to our Non-Executive Director at least annually.

4. Confidentiality

All reports of wrongdoing will be treated with the utmost confidentiality to the extent possible, considering the need to conduct a thorough investigation. Whistleblowers' identities will be protected to the fullest extent allowed by law, and only those individuals involved in the investigation will have access to the information provided.

5. Non-Retaliation

Pure Communications Group prohibits retaliation against any individual who reports concerns or participates in an investigation in good faith under this policy. Retaliation against whistleblowers will not be tolerated and may result in disciplinary action, up to and including termination of employment.



6. Investigation Process

All reports of misconduct will be promptly and thoroughly investigated by the appropriate individuals or department, which may include HR, Legal, Compliance, or an external investigator. Whistleblowers will be informed of the progress and outcome of the investigation to the extent possible, while respecting the confidentiality of the process and the individuals involved.

7. False Reports

Making false or malicious reports of misconduct is prohibited and may result in disciplinary action, up to and including termination of employment or commercial contract with Pure Communications Group.

8. Communication

Pure Communications Group will communicate this policy to all employees, contractors, and relevant stakeholders. The policy will be accessible on our company website and included in the Pure Bible.

9. Review and Revision

This policy will be reviewed annually and updated as necessary to reflect changes in the business environment, legal requirements, and best practices.

10. Conclusion

Pure Communications Group is committed to maintaining an open and transparent work environment where employees feel comfortable raising concerns without fear of reprisal. We encourage all stakeholders to speak up if they become aware of any activities that violate our ethical standards or legal obligations.

Last review date: February 24