

Whistleblowing Policy

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1. About this policy

Rosemont Pharmaceuticals is committed to conducting business with honesty, transparency and integrity. We expect the same high standards from everyone we work with – including employees, contractors, suppliers, service providers, consultant, agency workers, and any other third parties who do business with us.

This policy is designed to:

- Encourage individuals to report suspected wrongdoing or unethical behaviour as early as possible.
- Assure them that their concerns will be taken seriously and investigated appropriately.
- Protect their confidentiality and safeguard against retaliation.

This policy does not form part of any contract of employment or agreement, unless expressly stated, and may be amended at any time. It applies to:

- All Rosemont employees.
- Officers, consultants, contractors, casual and agency workers
- Suppliers, service providers, and other third-party business partners

2. What is Whistleblowing?

Whistleblowing refers to the reporting of suspected wrongdoing or dangers related to Rosemont's operations or supply chain. This includes, but is not limited to:

- Criminal activity (e.g. fraud, bribery, facilitation of tax evasion)
- Health and safety risks
- Environmental damage
- Breaches of legal, regulatory or professional obligations
- Violations of company policies (e.g. bribery, corruption, safeguarding)
- Attempts to conceal any of the above.

If your concern relates to personal treatment or workplace behaviour, please refer to our policy on Dignity at Work, or to our Grievance Policy, for guidance on how to proceed.

3. How to raise a concern

We encourage all individuals covered by this policy to raise concerns as early as possible, so that we can address and resolve issues promptly and effectively. We understand that speaking up can be difficult, and we are committed to providing a safe and supportive environment for doing so.

In the first instance, we encourage you to raise your concern with your line manager or your primary point of contact within Rosemont. They are often best placed to understand the context and take immediate action. However, if you feel unable to raise the matter with your manager – for example, if

the concern involves them or you feel uncomfortable doing so – you may instead contact the Human Resources team directly.

Your concern should be in writing and should clearly state the issue being raised under the Whistleblowing policy. It should include:

- A description of the concern.
- Relevant facts, including dates, locations, and names of individuals involved.
- Any supporting evidence you may have.
- Whether you are raising the concern confidentially.

We are committed to ensuring that all concerns raised under this policy are handled fairly, consistently, and without bias.

4. Confidentiality

Rosemont is committed to protecting the confidentiality of individuals who raise concerns under this policy. We understand that whistleblowers may feel vulnerable or apprehensive about coming forward, and we aim to create an environment where individuals feel safe and supported in doing so.

We strongly encourage individuals to raise concerns openly, as this allows for a more thorough and effective investigation. However, we recognise that in some cases, individuals may wish to raise concerns in confidence. Where a concern is raised confidentially, we will take reasonable steps to protect the identity of the whistleblower. This may include limiting disclosure of their identity to only those directly involved in investigating or addressing the concern, and only where it is strictly necessary.

While we discourage anonymous disclosures due to the challenges they present in conducting a fully investigation, we will still consider them. However, the ability to investigate and resolve anonymous concerns may be limited if we are unable to seek clarification or additional information.

If you are concerned about your identity being revealed, we encourage you to contact Caroline Hudson, Chief People Officer, either by email at caroline.hudson@rosemontpharma.com or via phone on 07484 913919 to discuss how your confidentiality can be maintained throughout the process.

5. Investigation procedure

Once a concern has been raised under this policy, it will be handled with the utmost seriousness and urgency. The matter will be referred to the Caroline Hudson, Chief People Officer (CPO), who will act as the initial point of escalation. Caroline will conduct a preliminary review of the concern and determine the appropriate course of action in consultation with Senior Legal Counsel.

The investigation process may include:

- Gathering relevant documentation and evidence.
- Interviewing individuals who may have knowledge of the matter.
- Consulting with subject matter experts or external investigators where appropriate.

The whistleblower will be invited to participate in an initial meeting to provide further context and detail. They may be accompanied by a colleague or a union representative, who must maintain confidentiality throughout the process.

We will aim to keep the whistleblower informed of the progress of the investigation, including expected timelines and any significant developments. However, in some cases, we may be unable to share specific details due to legal or confidentiality constraints. In such instances, we will explain the reasons for this as clearly as possible.

All investigations will be conducted fairly, objectively, and without bias. The outcome of the investigation will be documented, and appropriate action will be taken where necessary.

6. Protection and support for whistleblowers

Rosemont is committed to ensuring that no individual who raises a concern in good faith suffers any form of retaliation, victimisation, or disadvantage as a result of doing so. This includes protection from dismissal, disciplinary action, threats, harassment, or any other unfavourable treatment.

Any individual who believes they have been subjected to retaliation as a result of whistleblowing should report this immediately to Caroline Hudson, Chief People Officer, either by email at caroline.hudson@rosemontpharma.com or via phone on 07484 913919. Such reports will be taken seriously and investigated promptly.

Conversely, we also recognise that false or malicious allegations can cause significant harm. Any individual found to have deliberately made a false report with malicious intent may be subject to disciplinary action, up to and including dismissal for gross misconduct.

We are committed to supporting whistleblowers throughout the process and will offer access to confidential advice and support services where appropriate.

7. External disclosures

While we encourage all concerns to be raised internally in the first instance, we recognise that there may be circumstances where it is appropriate or necessary to report concerns to an external body. This may include regulators, law enforcement agencies, or other relevant authorities.

Before making an external disclosure, we strongly encourage individuals to seek independent legal advice or consult with a recognised whistleblowing charity such as Protect (formerly Public Concern at Work), to ensure that the disclosure is made appropriately with the necessary protections. You can contact Protect at <https://protect-advice.org.uk> or phone them on 020 3117 2520.

It is important to note that legal protections for whistleblowers under the Public Interest Disclosure Act 1998 apply only to certain types of disclosures and only when specific conditions are met. Making an external disclosure without following the appropriate steps may affect your legal rights.

8. Training and communication

Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

9. Review

The company reserves the right to amend, update, or withdraw this policy at any time, in line with business needs and applicable employment legislation. Any changes will be communicated appropriately to ensure transparency and understanding.

Policy: Whistleblowing			
Covering Legal Entities:		Primrose Topco and all subsidiaries	
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