



# SPEAK UP POLICY

**Date January 2023**

Version 2

## Contents

1. POLICY STATEMENT.....	3
2. SCOPE.....	4
3. WHEN SHOULD I SPEAK UP? .....	4
4. HOW CAN I SPEAK UP?.....	5
5. WHAT IS THE PROCEDURE FOR REPORTING MY CONCERNS?.....	6
Option 1 – Normal procedure .....	6
Option 2 – Alternative procedure .....	6
6. HOW WILL MY CONCERNS BE INVESTIGATED?.....	7
7. HOW IS CONFIDENTIALITY MANAGED?.....	8
8. WILL I BE KEPT UP TO DATE ON MY REPORT? .....	9
9. WHAT IF I AM NOT HAPPY WITH THE OUTCOME OF AN INVESTIGATION?.....	10
10. HOW AM I PROTECTED IF I SPEAK UP?.....	10
11. REPORTS FROM THIRD PARTIES .....	10
12. EXTERNAL DISCLOSURES.....	10
13. RESPONSIBILITY FOR THIS POLICY .....	10
Appendix A - Flow chart of procedure .....	12
Appendix B - contact numbers for “Speak Up” hotline .....	13

## Version Control

Version/date	Policy Manager	Policy Approver	Notes on changes since last version
Jan 2023	Carolyn Pate	Mandy Willis	

## 1. POLICY STATEMENT

Mace conducts its business at all times with the highest standards of integrity and honesty, and expects all its employees, workers, contractors and agents to maintain these standards in everything they do.

We are committed to creating and maintaining a culture of openness within our organisation so that individuals feel confident to raise any concerns relating to suspected wrongdoing at an early stage. We believe an environment in which individuals feel able to raise any matters of genuine concern without fear of disciplinary action or recrimination being taken against them is essential. We encourage individuals to report suspected wrongdoing as soon as possible and have put this policy in place to facilitate that.

It is the responsibility of all individuals working for and engaged by Mace to speak up if they are concerned about any form of wrongdoing covered by this policy. This policy sets out the way individuals may raise concerns they have and how Mace will respond to those concerns. This policy is intended to cover a wide range of potential wrongdoings related to Mace's activities and the way we do business.

This policy is not intended to cover grievances and complaints that relate to an individual's own employment position or personal circumstances at work. Such matters should be pursued through Mace's Grievance procedure

Mace has zero tolerance for retaliation against anyone who seeks advice, raises a concern or is involved in any investigation into suspected wrongdoing. Any complaints received of this nature will be fully investigated by the company and any person involved in such retaliatory conduct may be subject to disciplinary action.

Our people, clients, reputation and brand are extremely important to us, and we are committed to each of them. Our core values define our behaviours and our Speak Up policy will help to ensure these behaviours are upheld. We hope individuals will feel able to raise their concerns openly under this policy. We are committed to listening to our people and any concerns raised under this policy will be treated with sensitivity and seriousness. We understand that raising concerns of this nature can be difficult and so we commit to dealing with any concerns raised appropriately, consistently, fairly and professionally and in a timely manner.

Should you feel you have been subjected to any detrimental treatment as a result of raising a concern under this policy, you should notify the HR Team immediately. If the matter is not dealt with to your satisfaction, then you should raise it formally using Mace's Grievance procedure. This policy does not form part of any contract of employment, and we may amend or withdraw it at any time at our absolute discretion.

**Mark Reynolds**  
**Group Chairman & CEO**

## 2. SCOPE

This policy applies to all employees, across all levels of seniority, working for Mace Limited or any of its subsidiaries (together referred to in this policy as “Mace”, “we”, “us” or “our”), whether permanent, fixed term or temporary, including full and part time workers, contractors, consultants, trainees, joint venture partners and agency workers engaged by Mace (collectively referred to as “Staff” for the purposes of this policy). There is no qualifying period of employment or work needed before a member of Staff can use this policy.

All Staff working for Mace may report any concerns of misconduct by following the Speak Up procedure (see Appendix A below).

Concerns reported under this policy will usually relate to the conduct of Mace, and our Staff, but they may sometimes relate to the actions of a third party, such as a customer or contractor. If so, we encourage you to raise any concerns you may have about a third party internally in accordance with the procedure set out in this policy so that we can deal with them appropriately.

The Speak Up policy should not be used to address complaints that relate to an individual's own employment position or personal circumstances at work which should be addressed through our Grievance procedure. In the event that a complaint received under the Speak Up policy is considered to constitute a personal grievance, Mace reserves the right to require that the matter raised be addressed through the Grievance procedure.

## 3. WHEN SHOULD I SPEAK UP?

You should speak up if you know or have reasonable belief, suspicion, or concern in relation to our activities that any of the following is being, has been or is likely to be committed:

- a criminal offence or criminal wrongdoing;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment or communities we work in;
- financial mismanagement or malpractice (fraud, theft, money laundering, tax evasion and dealings with the proceeds of crime);
- bribery or corruption;
- negligence;
- dishonesty or unfairness in dealing with customers or suppliers;
- unauthorised disclosure of confidential information;
- a breach of our core values, Ethical Business Conduct Policy or any other internal policies and procedures;
- racial or sexual harassment or discrimination;
- bullying, threats, blackmail, intimidation or retaliation;

- contravention of competition laws;
- contravention of a Client's policies and procedures;
- misuse of a client's or third party's assets;
- conflicts of interest;
- failure to maintain accurate books and records/accounts;
- falsification or destruction of books and records/accounts;
- criminal damage;
- drugs and/ or alcohol in the workplace;
- failure to comply with any legal or professional obligation, or regulatory requirements;
- deliberate concealment of information about any of the above; or
- any other conduct of a fellow member of Staff not covered by the above which would be likely to harm the reputation of Mace.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be committed — a reasonable belief is sufficient.

By speaking up, we can protect ourselves and others. If you know about or suspect misconduct, we encourage you to disclose the facts that are known to you as soon as possible. Early disclosure helps ensure that any problems are resolved quickly and allows for a full and accurate investigation to take place.

You are not responsible for investigating the matter — the business will decide how to respond and carry out any necessary investigation.

## **4. HOW CAN I SPEAK UP?**

The best way to raise a concern is to do so openly and Mace would hope you feel able to voice any concerns without the need to do so anonymously. Openness makes it easier for us to assess the issue, obtain more information and thoroughly investigate the matter. However, if you want to raise your concern anonymously, or you wish to give your name on the condition it is not revealed without your consent, please make this clear when reporting your concern.

There are some country laws which do not allow anonymous reporting, but we will discuss this with you where it applies to your report and provide you with advice and support.

When making a report, please provide as much detail as possible. It is easier for us to investigate a concern if we have relevant information to do so. If possible, we would like to receive:

- as much information as you have about the background, history and reason for your concern;
- names, dates, locations and other relevant information; and
- documents that might add to your concern (if you are based in the UK, do not include documents that contain confidential information).

If the details you provide are vague, insufficient or unclear it will be more difficult for us to investigate your concern and give you feedback. We would therefore encourage individuals to put their name to their concerns wherever possible.

## 5. WHAT IS THE PROCEDURE FOR REPORTING MY CONCERNS?

Any member of Staff wishing to make a disclosure under this policy should follow the procedures outlined below. Please note, option 1 will not be available unless you are employed by Mace.

### Option 1 – Normal procedure

In the first instance, you are encouraged to speak with your line manager. If, for whatever reason, you feel unable to report your concern to your line manager you can report the matter to your line manager's manager, a member of the Legal department or your HR Business Partner ("HRBP"). You can make a report in writing or orally. An oral report can be made by telephone (or other voice messaging system) or you can request a physical meeting with your line manager or your HRBP.

### Option 2 – Alternative procedure

If you feel that your concern has not been addressed, or you prefer not to raise it with us directly for any reason, you can report your concerns to our confidential "Speak Up" hotline. This is a service provided by an independent third-party organisation, Safecall.

The Safecall service is available 24 hours a day, seven days a week, in all languages of the locations in which we operate. All calls are handled by professionally trained call handlers who will take your report about any concerns covered by this policy on a confidential basis.

You can report any concerns covered by this policy via the Safecall service in either of the following ways:

- Call the "Speak Up" hotline and speak to a professionally trained call handler. Please see Appendix B for all local telephone numbers.
- Use web reporting and make a report online via [www.safecall.co.uk/report/](http://www.safecall.co.uk/report/). You can report your concern in many different languages.

When you report a concern through the Safecall service, there are three options regarding your identity:

- an anonymous option: you do not reveal your identity to Safecall or Mace;
- a semi-anonymous option: you agree to provide your identity to Safecall, but this information will not be provided to Mace; or
- a named option: you agree that your identity can be passed by Safecall to Mace.

After reporting your concern(s) under the normal procedure (option 1) or the alternative procedure (option 2), you will receive an acknowledgment of receipt within 7 days. The individual or entity which you report your concern to (either your line manager, HRBP or Safecall), will provide feedback and keep you updated on follow up measures as needed.

## When not to use the Speak Up procedure

For the avoidance of doubt, the Speak Up procedure and reporting mechanisms should not be used in the following circumstances:

- With malicious intent or in bad faith, e.g., for the sole purpose of harassing, intimidating, annoying or humiliating another (this may lead to disciplinary measures imposed on you);
- For issues or grievances you may have in relation to matters occurring during the course of your employment
  - (i) For such matters your direct manager and/or HRBP are the primary points of contact.
  - (ii) However, if you have raised your HR related matter to your direct manager and HR contact and you feel that the Mace process has not been followed correctly you can use the Hotline to report this. The Hotline is not intended to be used as a method of appealing disciplinary outcomes;
- For events presenting an immediate threat to life or property. If applicable, call the national emergency services number;
- To settle personal disputes;
- To make accusations which you know are false; or
- To obtain answers to questions or to provide comments on Mace policies or procedures or interpretation of their applicability. In this case you should contact your direct manager.

## 6. HOW WILL MY CONCERNS BE INVESTIGATED?

The investigation of a concern will be conducted in an independent, fair, unbiased and timely manner with respect to all parties involved and in accordance with Mace protocols and all applicable laws and regulations.

If you report your concerns under option1 –normal procedure

If you make your disclosure in person, the person that you make your disclosure to will invite you to an initial meeting to discuss what action needs to be taken. During the meeting, a written summary of your concern may be taken down and, if so, you can be provided with a written copy after the meeting. You will also be given an indication as to how the matter will be dealt with.

If you report your concerns under option 2 – alternative procedure

Where you report your concerns via the Speak Up hotline, you will be given a unique number which you can use to check if you have received any messages related to your concern.

## Investigation process

Once a report has been received through either option 1 or 2, the Group Company Secretary will follow the escalation process in place and provide the report to an investigator to be dealt with appropriately, depending on the seriousness of the report. Depending upon the nature of the report, it may involve a full internal investigation overseen by the Investigation Team, (made up as appropriate by a Group Board Director, Group Company Secretary and reporting to the Group CEO) or it may be passed onto the most appropriate area of the business to follow up and respond accordingly. On occasions it may be necessary to have the matter reviewed by an external independent body.

In most instances, the investigator(s) will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information. In any event, following the conclusion of the investigation a report will be produced.

After the report is produced there will be a review stage, the process of which will be subject matter specific.

In all circumstances, any corrective measures requested will be reviewed by and confirmed to the Group Company Secretary. The corrective measures taken will also be verified and logged. If you provided your contact details, an investigator may contact you to discuss your concerns. If we need help from you investigating the issue, we will be sensitive in seeking your assistance and will support you through the process. Alternatively, if you reported your concerns through the alternative procedure (option 2), you should call the Speak Up hotline or log into the web portal to check if additional information is needed from you to address your concern.

## 7. HOW IS CONFIDENTIALITY MANAGED?

When information is provided to an investigator, or an investigative team, they shall proceed on a confidential basis subject to the following limitations:

- if civil proceedings concerning any matter that was the subject of the investigation are raised, the investigator(s) may be ordered by a court or tribunal to disclose documentation and information in relation to the investigation;
- if a person discloses information which raises a concern regarding the safety or wellbeing of an individual, the investigator(s) may decide to disclose this information to Mace and/or a regulatory body for the purposes of ensuring health and safety; and
- if a person discloses information which raises a concern regarding a potential criminal offence, the investigator(s) may decide to report the matter to Mace and/or the police.

In the event that information is disclosed to Mace, a regulatory body or to the police, the investigator(s), will use reasonable efforts to avoid disclosing the identity of any person who has requested anonymity, but this is not guaranteed. We will try our best to preserve confidentiality and only reveal your identity where necessary, including when:

- disclosure is necessary for the purpose of the investigation [(this does not apply to Mace's parent or other group companies)];
- disclosure is necessary to comply with a legal obligation;
- your identity is already within the public domain; or
- your identity needs to be disclosed to professional advisers, on a strictly confidential basis, for the purpose of obtaining further advice.

If there are any other circumstances where your identity needs to be revealed outside of the circumstances listed above, where possible and to the extent legally permissible, the matter will first be discussed directly with you.

Except as provided for by the section on external disclosure below, you are expected to keep the fact that you have raised a concern under this policy confidential unless and until you are informed otherwise, to ensure that no investigation is jeopardised.

## **8. WILL I BE KEPT UP TO DATE ON MY REPORT?**

Please be aware that investigations may take time and visible action may not be immediate. Where appropriate, we will aim to keep you informed of any progress of an investigation and the likely timescale for completion. However, sometimes the need for confidentiality may prevent us from discussing the precise nature of our actions, specific details of the investigation or any action taken.

You should treat any information about the investigation as confidential.

Following the investigation, we will aim to communicate the outcome to you as soon as possible, but at least within three months, and, as appropriate, to the other individual(s) being investigated. Please note, in certain circumstances, we may not be able to notify you of the outcome of an investigation.

Where appropriate, Mace may refer matters to external authorities. Please note, in some circumstances Mace may need to make such a referral without your knowledge or consent.

## **9. WHAT IF I AM NOT HAPPY WITH THE OUTCOME OF AN INVESTIGATION?**

If you are unhappy with the way that your concern has been handled under the normal procedure (option 1), you can raise your concern under the alternative procedure (option 2). The outcome of an investigation under the alternative procedure will be final.

## **10. HOW AM I PROTECTED IF I SPEAK UP?**

We understand that you may be worried about possible repercussions if you speak up about any concerns you may have. We aim to encourage openness and support e who raise concerns under this policy, even if they turn out to be mistaken.

If you raise a concern under the procedure outlined in this policy, you will not be dismissed or be subjected to any other detriment or retaliation, such as harassment or victimisation, as a result of raising a concern.

If you believe that you have suffered a detriment or retaliation within the workplace as a result of raising concerns under this policy, you should raise a formal grievance under the Grievance procedure.

## **11. REPORTS FROM THIRD PARTIES**

Mace will fully investigate any disclosure made to it by third parties (e.g., suppliers, customers, counterparties) of any circumstances or conduct that the third party believe Mace should be aware of. Third parties should follow the alternative procedure (option 2) to report any concerns they may have.

## **12. EXTERNAL DISCLOSURES**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying wrongdoing or danger in the workplace and we encourage you to raise the matter internally and seek advice before reporting a concern to anyone external.

## **13. RESPONSIBILITY FOR THIS POLICY**

The Group Chairman & CEO has overall responsibility for the content of this policy, taking reasonable measures to ensure awareness of this policy, and reviewing the effectiveness of actions taken in response to concerns raised under this policy.

# SPEAK UP POLICY

---

The Group Chairman & CEO & is provided with regular updates on the number and type of concerns reported through Safecall, including the number of concerns found to be (fully or partially) substantiated, and any trends or concerns.

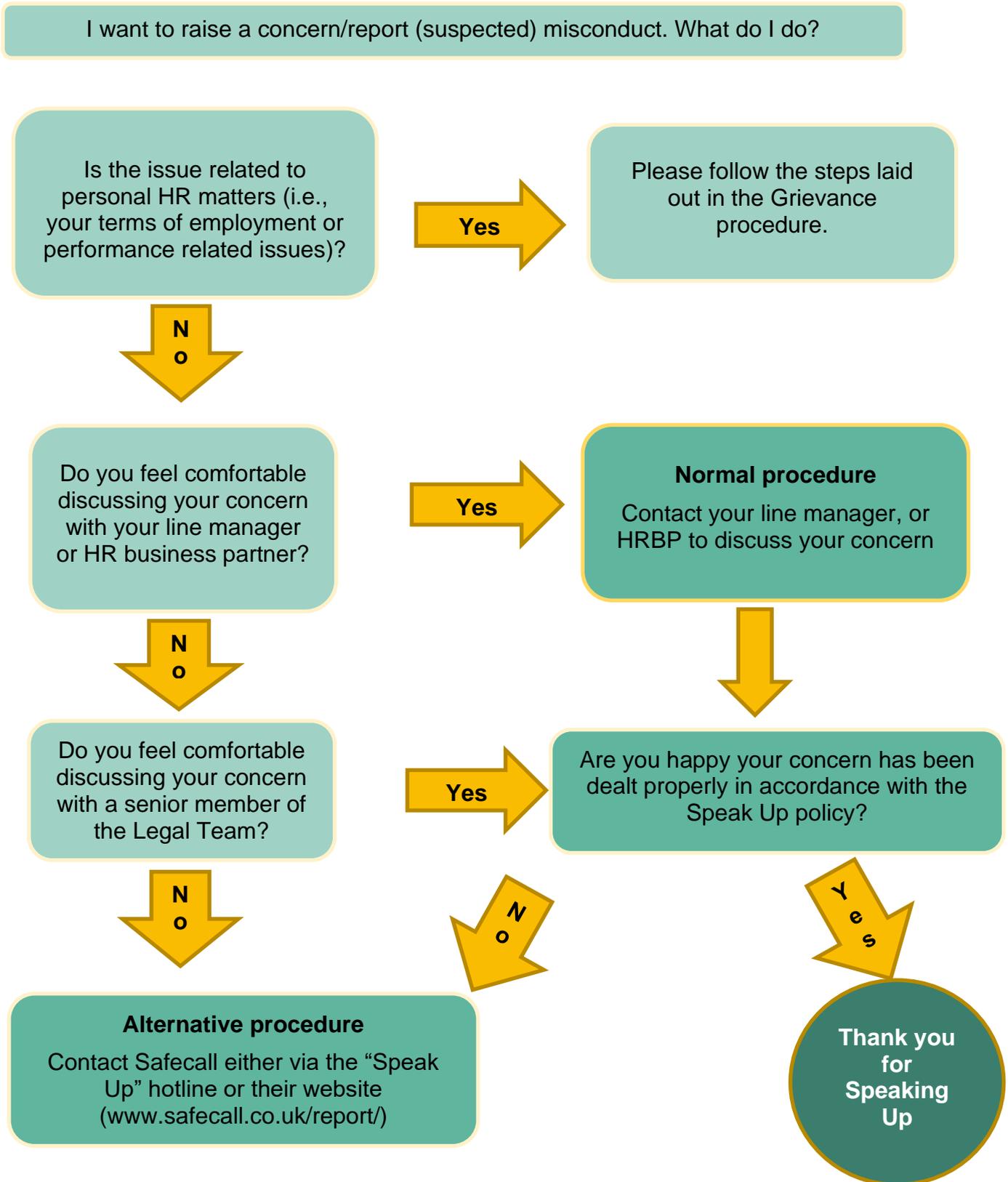
Each Engine CEO within Mace is expected to establish a culture of compliance with this policy. The leader of each Engine within Mace is responsible, along with the Group Chairman & CEO for ensuring effective transmission of this policy throughout their part of the organisation, together with communicating relevant guidance and training, and appropriate safeguards, monitoring, and resources, in order to ensure compliance with this policy.

Managers have a specific responsibility to facilitate the operation of this policy and to ensure that employees feel able to raise concerns in accordance with this policy without fear of repercussions.

All employees should be aware of and are responsible for the success of this policy. All employees and third parties covered by this policy should ensure that they take steps to disclose any wrongdoing or dangers at work of which they become aware.

This policy shall be reviewed by the Group Company Secretary annually.

Appendix A - Flow chart of procedure



## Appendix B - contact numbers for “Speak Up” hotline

Please refer to the table below for all local telephone numbers to call Safecall. The Safecall service is free to call, and is available 24 hours a day, seven days a week, in all languages of the locations in which we operate. All calls are handled by professionally trained call handlers who will take your report about any concerns covered by this policy on a confidential basis.

Country	Telephone number
Abu Dhabi	8000 4413376
Angola	+44 191 516 7764
Australia	1800 312928
Austria	00800 7233 2255
Azerbaijan	+44 191 516 7758
Bahrain	8000 4264
Belgium	00800 7233 2255
Brazil	0800 892 1750
Canada	1877 59 98073
China (Unicom/Netcom)	10800 7440605
China (Telecom)	10800 4400682
Costa Rica	08000 440128
Croatia	0800222847
Czech Republic	00 800 72332255
Denmark	00 800 72332255
Dubai	8000 4413376
Egypt	0800 000 0059
Finland	990 800 72332255 (Telia)
Finland	999 800 72332255 (Elisa)
France	00 800 72332255
Georgia	+44 191 516 7788
Germany	+49 800 72332255
Ghana	+44 191 516 7764
Greece	00800 44141966
Hong Kong	3077 5524
India	0008004401256
Ireland	1800 812740
Italy	00 800 72332255
Japan	0120 921067
Jersey	0800 915 1571
Jordan	+44 191 516 7756
Kenya	+44 191 516 7764
Luxembourg	00 800 72332255
Macau	00 800 7233 2255
Maldives	+44 191 516 7756

Country	Telephone number
Mauritius	8020440038
Morocco	+44 191 516 7764
Netherlands	00 800 72332255
New Zealand	00 800 72332255
Nigeria	+44 191 516 7764
Norway	00 800 7233 2255
Oman	800 72323
Peru	0800 77601
Philippines	1800 1441 0499
Poland	00 800 72332255
Portugal	00 800 72332255
Qatar	8000 250
Romania	0372 741 942
Rwanda	+44 191 516 7764
Saudi Arabia	800 8442067
Singapore	800 4481773
Slovenia	0800 81096
South Africa	0800 990243
Spain	00 800 72332255
Sweden	0850 252 122
Switzerland	00 800 72332255
Taiwan	00 800 72332255
Trinidad and Tobago	1888 388 1596
Turkey	00800 4488 20729
UAE	8000 4413376
Uganda	+44 191 516 7764
UK	0800 9151571
USA	1 866 901 3295
Vietnam (Mobifone)	121 020036
Vietnam VNPT	120 11157
Vietnam Viettel	122 80725

**Mace**  
155 Moorgate  
London EC2M 6XB  
T +44 (0) 20 3522 3000