

Whistleblowing Policy

The **Protected Disclosures (Amendment) Act 2022** was implemented to protect employees in the public, private and not-for-profit sectors in regard to retaliation should they report any wrongdoing (also known as whistleblowing) in the workplace.

We are committed to the highest standards of openness, integrity and accountability and an important aspect of these standards are to ensure transparency as a mechanism to enable our team members and other persons on our team to be able to voice and highlight concerns in a responsible and effective manner.

It is a condition of employment, that an employee will not disclose confidential information about the company. Nevertheless, where an employee / individual discovers information which they reasonably believe shows either malpractice or wrongdoing within the Company, then this information should be disclosed without fear of reprisal.

It should be emphasised that this policy is intended to assist individuals who believe they have relevant information relating to malpractice or impropriety.

This policy is not designed to question financial or business decisions taken by the organisation nor should it be used to reconsider any matters, which have already been addressed under through our grievance or disciplinary procedures. With our whistleblowing procedures outlined in this policy, we would encourage our employees to use this process rather than disclose the information outside the company.

Internal Reporting Channel: ABM Compliance Hotline

As per the Protected Disclosures (Amendment) Act 2022 all organisations with 250 or more employees must establish internal channels for their employees to report wrongdoing. This internal channel has been designed in a GDPR Compliant manner which ensures the confidentiality of the reporting person and any other person(s) named in the report.

The ABM Compliance Hotline is a web and phone-based complaints reporting system available to team members of the company, as well as a secure database the company uses to process and store data relating to team member complaints. When a complaint is submitted via Compliance Hotline reporting system, the details of the complaint will be processed and stored in the system.

This also includes some personal data. When a complaint is submitted outside the ABM Compliance Hotline reporting system, in accordance with this policy, the manager dealing with the complaint will usually enter details of the complaint into the system.

Again, this includes some personal data. Storing the details of each complaint centrally is important because it can help the company deal with grievances effectively. It also means that the company can monitor the frequency of certain types of complaint and the effectiveness of its processes. Before entering any personal data into the ABM Compliance Hotline system.

If the team member consents, they should confirm this in writing and the relevant data should then be entered into the system. If the team member does not consent, then the data should not be entered into the ABM Compliance Hotline system. However, copies of certain

documents and information relating to the concern may still be attached to the team member's personnel file in accordance with this policy.

Report a Compliance or Ethics Complaint

To report incidents of possible fraud, theft, or misconduct, as well as discriminatory, harassing, or retaliatory conduct, in the workplace, please use one of the following options.

1. Call the ABM Compliance Hotline: 1800-903-224 Ireland and 0800-069-8801 UK. The Hotline is staffed 24 hours a day, 7 days a week. Specialists are available to take calls in over 100 languages.
2. Report Online: abmhotlineeurope.ethicspoint.com. Reports are taken by an unbiased vendor and are forwarded in a secure and confidential manner to an appropriate Human Resources professional for prompt investigation.
3. Report to your local Human Resources representative or director.
4. By mail to ABM corporate headquarters, addressed to ABM Ethics and Compliance, ABM Industries Incorporated, One Liberty Plaza, 7th Floor, New York, NY 10006, United States.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, potential dangers or Health and Safety concerns which could jeopardise the company and / or its employees within the workplace. These could include but not limited to the following:

- A criminal offence.
- Fraud.
- Failure to comply with a legal obligation or regulatory requirement.
- Any miscarriage of justice.
- Danger to health and safety.
- Environmental damage.
- Bribery.
- Deliberate attempts to conceal any information about the above.

Should a team member have any genuine concerns related to suspected wrongdoing or potential danger(s) affecting any Company activities (a whistleblowing concern) they should report it as soon as possible under this policy. Team members who raise legitimate concerns about specified matters are protected by the **Protected Disclosures (Amendment) Act 2022**.

Should a team member be unsure that their concern is a whistleblowing matter, they should raise the concern with their Line Manager/HR Department at humanresources@abmireland.com. Once an alleged whistleblowing concern has been raised, an appropriate manager will investigate the concerns promptly and in accordance with this policy.

Please note we do not require the individual to carry out an investigation themselves. Employees are also not expected to provide any proof of their alleged concern; however, they must have a reasonable belief that there are grounds for same.

It should be noted that appropriate disciplinary action may be taken against any employee who is found to have raised a concern or raised a disclosure with malicious intent. It is important to note that in situations where an employee makes a disclosure not in compliance with the Act, the protections under the Act will not be available to the employee.

Whistleblowing Procedure

Raising a Concern

In the first instance any concerns should be raised with the team member's Line Manager. Should the concern be in relation to your Line Manager, please contact your Director. Depending on the nature of the concern, the line manager may refer the matter to another manager for investigation. If for any reason the team member does not wish to approach their line manager, the team member should approach a different manager, a senior manager, a Director of the Company, or their HR representative. Alternatively, the team member can also use the ABM Compliance Hotline web and phone-based reporting system (contact details in here). Team members are encouraged to summarise their whistleblowing concern in writing and provide as much factual detail as possible.

Investigation

The team member and any other individual(s) allegedly involved will be required to provide written statements of their concern(s). The manager will aim to keep the team member informed of the progress of any investigation and its likely timescale. Any investigation will be carried out in accordance with the procedures set out above.

The investigating manager will compile an investigation report and forward to a senior manager who will review and take any necessary action. This may include reporting the concern to an external regulatory body such as An Garda Síochána / Police or addressing the concern in accordance with the company's Disciplinary Procedures which carries sanctions up to and including dismissal.

Media & Publicity

As per our Media Policy, any statements to reporters from newspapers, radio, television, etc. will only be provided by the Managing Director or their nominated representative. Team members are not permitted to publish or promote their whistleblowing concerns online, for example on social media or on blogs.

The reason for same is that these actions may interfere with the Company conducting a fair investigation into the whistleblowing concerns and may affect the rights of the accused team member. If a team member acts maliciously or dishonestly in publishing their concerns, it may be deemed an act of misconduct which may be dealt with in accordance with our Disciplinary Policy.

Timescales

Due to the varied nature of a whistleblowing concern, which may involve internal investigators and/or the Garda Síochána / Police, it is not possible to outline precise timescales for completion of such investigations. The investigating manager will, as soon as reasonably possible, send a written acknowledgement of the concern to the complainant. The investigating manager will ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.