

Whistleblowing policy

OWNER: AMRIT KHAREL, DIRECTOR, UK OPERATIONS

LAST REVIEWED: SEPTEMBER 2026

NEXT REVIEW: SEPTEMBER 2027

Purpose

This policy provides guidance on how to raise concerns about wrongdoing within Kyros Software Ltd (Co. 16915277) or by those acting on our behalf. It is designed to encourage and enable staff and associates to report concerns without fear of retaliation.

Scope

This policy applies to all staff, contractors, subcontractors and anyone working on behalf of the company. It covers concerns about the company's activities, not personal grievances (which should be raised through the normal complaints process).

What to report

Whistleblowing applies to concerns about wrongdoing that is in the public interest, including:

- Criminal activity, including fraud and bribery
- Failure to comply with legal obligations
- Miscarriage of justice
- Danger to health and safety
- Environmental damage
- Deliberate concealment of any of the above

How to report

Step 1: Report internally

In the first instance, raise your concern with:

Amrit Kharel, Director Email: info@kyrosweb.com Phone: +44 7882 536601

You may raise concerns verbally or in writing. Please provide as much detail as possible, including dates, names, locations and any evidence or documentation.

Step 2: External reporting

If you feel unable to raise the concern internally, or if you have raised it and believe it has not been properly addressed, you may contact a prescribed person or body. Relevant external bodies include:

National Audit Office — concerns about the proper conduct of public business
Information Commissioner's Office (ICO) — data protection and freedom of information
Serious Fraud Office (SFO) — serious or complex fraud, bribery and corruption
Health and Safety Executive (HSE) — workplace health and safety
Protect (formerly Public Concern at Work) — independent whistleblowing advice, 020 3117 2520

Protections

Under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998):

Workers who make a qualifying disclosure are protected from dismissal or detriment.

We will not tolerate any retaliation, harassment or victimisation of anyone who raises a concern in good faith.

Protection applies even if the concern turns out to be unfounded, provided it was raised in good faith and the whistleblower reasonably believed the information to be true.

Confidentiality

We will treat all concerns as confidentially as possible. The identity of the whistleblower will not be disclosed without their consent unless required by law.

Anonymous reports will be considered, but they are harder to investigate. We encourage reporters to identify themselves where possible.

Investigation process

The Director acknowledges receipt of the concern within 5 working days.

The Director assesses the concern and determines how it should be investigated.

Where the concern involves the Director, an independent person will be appointed to investigate.

The investigation is conducted promptly and proportionately.

The whistleblower is informed of the outcome, subject to legal constraints on disclosure.

If the investigation reveals wrongdoing, appropriate corrective action is taken, which may include disciplinary action, referral to external bodies or changes to policies and procedures.

Review

This policy is reviewed annually. The next review is due September 2027.