

# Whistleblowing Policy

August 2024

**Future Biogas is one of the UK's largest producers of biomethane. At the forefront of the anaerobic digestion (AD) industry, Future Biogas is a highly regarded developer and operator of AD plants, providing full asset management service capabilities to a number of blue-chip asset owners. Over the last decade Future Biogas has successfully demonstrated the wide range of benefits to agricultural and food production from integrating biomass for AD into the farming rotation.**

## Purpose

It is our policy to conduct all of our business in an honest and ethical manner. Future Biogas recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with to ensure our success as a company.

This policy is designed to provide guidance to all those who work with or within the company, including directors, managers, employees, consultants, contractors and agency workers, who may from time to time feel that they need to raise certain issues relating to the company with someone in confidence.

### This policy aims to:

- a) provide an explanation of what whistle blowing is
- b) encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected.
- c) provide employees with guidance as to how to raise those concerns; and
- d) reassure employees that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

## What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This could include:

- a) criminal offences (this may include, for example, types of financial impropriety such as fraud or bribery)
  - b) a failure to comply with an obligation set out in law
  - c) the endangering of someone's health and safety
  - d) damage to the environment
  - e) discrimination (racial, sexual, religious etc)
  - f) covering up a wrongdoing in the above categories
- miscarriages of justice



A whistle-blower is a person who raises a genuine concern relating to any of the above. If a employee has any genuine concerns related to suspected wrongdoing or dangers affecting any of the company's activities, they should report it under this policy.

If a employee is uncertain whether something is within the scope of this policy you can seek advice from the Company's nominated Whistleblowing Officer, whose contact details are below.

## Who does this policy apply to?

This policy applies to Future Biogas Holdco Limited and all its subsidiaries (the **"Future Biogas Group"**) and all individuals working within the Future Biogas Group as employees or agents, and all their employees and agents. This policy does not form part of any employee's contract of employment and it may be amended at any time.

This policy should not be used for complaints relating to personal circumstances and/or contractual employment terms. For such cases, the Company's Grievance Procedure (set out in the Company's Employee Handbook) should be followed.

While we hope that such disclosures will never be necessary, we recognise it is important to have an accessible procedure employees can follow in case circumstances arise where an employee suspects a wrongdoing or danger is occurring within the company. Each case will be treated on its own facts.

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## Reporting procedure

Any employee who discovers or suspects any type of wrongdoing in the workplace should immediately contact their direct line manager or a director, to allow those in positions of responsibility and authority an opportunity to examine any such matter and take swift and appropriate action.

You do not need to provide evidence in order to raise a concern under this policy. Once a concern has been raised, it will be assessed, and consideration will be given as to what action may be appropriate. This could involve an informal review or a more formal investigation. The employee raising the concern will be advised as to what further assistance may be needed.

If an employee has any personal interest in the matter, they should disclose this at the outset. If it is felt that the concern falls more properly within the scope of one of our other policies, this will be advised.

Where the employee feels that their line manager or other managers within their area of the business have not addressed their concern, or they would prefer not to raise it with them for

any reason, they should contact our external reporting service provider, AAB People (formerly branded as SeeHearSpeakUp).

AAB People provides employees with the facility to raise concerns via the following confidential reporting channels;

- a) By completing an online web referral report via the website [www.fileaconcern.org/futurebiogas](http://www.fileaconcern.org/futurebiogas).
- a) By ringing AAB People on the confidential helpline number **0800 988 6818**.

When employees contact AAB People via the designated telephone number above, they will speak with a call handler who will ask them for some information, document feedback and ask follow-up questions to clarify information.

The call handler will then prepare a report of their concern to be sent to Future Biogas's nominated officers who will be responsible for determining what course of action is to be taken.

**Future Biogas's nominated officers are named in the table below:**

No	Contact Name	Job Title	Telephone	Email Address
1	Jenny Bannerman	HR Director	01483 662142	jenny.bannerman@futurebiogas.com
2	Colin Mills	Chief Operating Officer	07786 278147	colin.mills@futurebiogas.com
3	Graham Methold	General Counsel & Company Secretary	01483 671509	graham.methold@futurebiogas.com

## Responding to a Whistleblowing report

Assuming you have not reported the matter anonymously, any report raised under this policy will be acknowledged in writing within 7 days of receipt.

**You will be advised as to:**

- a) Whether or not further information is required from you and whether you may be required to attend meetings to provide additional information;
- b) How Future Biogas proposes to deal with the matter;
- c) Whether any initial enquiries have been made; and
- d) Whether further investigations will take place and, if not, why not.

Future Biogas's nominated officers will follow-up on reports raised and arrange for reports to be promptly and thoroughly investigated. Should personal details be provided by a whistleblower, the nominated officer will maintain contact with the person making the report, request further information where necessary and provide feedback to that individual.

The Company will not tolerate allegations made maliciously. People making such allegations may be subject to disciplinary action and/or legal actions by the individuals accused of unlawful activity.

In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

Where an employee is required to attend a meeting or interview this can be arranged away from the workplace if the employee wishes and they may be accompanied by a representative, colleague or friend.

In the event that an employee is required to give evidence in any disciplinary or criminal proceedings they will be given advice and support regarding the procedure.

We endeavour to keep employees who raise reports informed of the progress of the investigation and its likely timescale.

Cont.

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## Responding to a Whistleblowing report cont.

However, sometimes legal constraints or the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. Employees should treat any information about the investigation as confidential.

If at any time throughout the investigation it becomes evident that formal disciplinary action may be a possible outcome, the investigation will be conducted in accordance with the provisions of the Company's Disciplinary policy.

The time to undertake an investigation into any matters raised under this policy is dependant on the nature and complexity of the information provided. However, all reports received are treated seriously and will be diligently followed up by the company.

## Confidentiality

We hope that employees will feel able to raise matters openly under this policy, by contacting their line manager, a nominated officer or the whistleblowing officer first. The reporting channels for receiving concerns under this policy have been designed, established and are operated in a secure manner to ensure the confidentiality of the person making the disclosure and any persons referred to in the disclosure. If it is necessary for anyone investigating a concern to know their identity, we will discuss this with you first.

Please note that no telephone calls are recorded by AAB People. However, the key details of the conversation will be noted by the AAB People call handler taking the call.

Under this policy employees may choose to raise reports anonymously. AAB People will only share personal information with those appointed in Future Biogas to investigate a report where an employee has provided consent to do so. We encourage employees to only make disclosures anonymously if absolutely necessary as a proper investigation may be more difficult if the Company cannot obtain further information from employees who raise reports.

When contacting AAB People to raise a report the employee will be provided with a Personal Identification Code. As a result,

we have no means of identifying the employee unless they volunteer their contact details. The Personal Identification Code, which is unique to their report, can be quoted by the employee should they wish to phone AAB People again in the future to check for any feedback that Future Biogas has provided or should they wish to provide additional information pertaining to their original report.

Employees who are concerned about possible reprisals if their identity is revealed should raise the matter to the Whistleblowing Officer, who will take appropriate measures to preserve confidentiality, where possible.

If the employee has provided consent to share their contact information, then we will contact them directly to provide them with feedback on their report. Feedback should be provided to the person who made the disclosure within a reasonable period, but no more than 3 months from the date of the acknowledgement of receipt of the report raised. If the employee has elected to remain fully anonymous, they are encouraged to contact AAB People by phone to seek feedback quoting their Personal Identification Code.

## Protection

It is understandable that whistleblowers are sometimes worried about possible repercussions when raising a report. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

In the UK, the Public Interest Disclosure Act 1998 gives legal protection to UK employees against being dismissed or penalised by their employers because of publicly disclosing serious concerns. Any person who raises genuine concerns in good faith under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure is a disciplinary offence.

Any employees or others who believe that they have suffered detrimental treatment after raising a legitimate concern should contact AAB People using one of the reporting channels available and provide information relating to their concern.

## Who is responsible for this policy?

This policy has been approved by the board of Future Biogas Holdco Limited and they have overall responsibility on behalf of the Future Biogas Group for this policy.

The Chief Executive Officer has ultimate day to day responsibility for the implementation of this policy and delegates line management responsibility requiring commitment from all employees, consultants and contractors.

If you have any questions, doubts or concerns about the policy or its application you should consult your line manager or, the Human Resources department.

The Board will review this policy at least annually and update it as required, monitoring its implementation on an ongoing basis.

## Contacts

### Chief Executive Officer

Philipp Lukas  
philipp.lukas@futurebiogas.com  
01483 375925

### Human Resources Department

Jenny Bannerman  
jenny.bannerman@futurebiogas.com  
01483 662142

# Whistleblowing Policy

This Whistleblowing Policy was approved by the Board on 28th July 2023.

Signed: 

Philip Lukas

On behalf of the directors of Future Biogas Holdco Limited

## Record of changes

Revision	Date	Record of Changes	Approved by
2.0	21 August 2024	Annual Review and Board Approval. Rebranding of SeeHearSpeakUp to AAB People.	
1.0	28 July 2023	Initial Issue	The Board