

## Alliance Management Systems Speak Up Policy

**AMS POL 03**  
Date: December 2022

### 1. ABOUT THIS POLICY

- 1.1. We are committed to conducting our business with honesty and integrity, and we expect everyone working in Alliance to maintain these high standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.
- 1.2. The aims of this Policy are:
  - a) To encourage everyone 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.
  - b) To provide everyone with guidance as to how to raise those concerns.
  - c) To reassure everyone that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3. The Audit and Risk Committee has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

### 2. WHAT IS SPEAK UP?

- 2.1. Speak Up is reporting or raising any serious concerns that you have about the products or services Alliance offers, or the conduct of employees, officers or any others acting on Alliance's behalf that:
  - a) are not in keeping with our Code of Conduct and policies;
  - b) make you feel uncomfortable in terms of known standards;
  - c) fall below established standards of practice; or
  - d) are improper behaviour.

These may include:

  - e) criminal activity;
  - f) failure to comply with any legal or professional obligation or regulatory requirements;
  - g) miscarriages of justice;
  - h) danger to health and safety;
  - i) damage to the environment;
  - j) bribery under our Anti-corruption and Bribery Policy;
  - k) facilitating tax evasion contrary to our Anti-facilitation of tax evasion policy;
  - l) financial fraud or mismanagement;
  - m) breach of our internal codes, policies and procedures;
  - n) conduct likely to damage our reputation or financial wellbeing;
  - o) unauthorised disclosure of confidential information;
  - p) negligence;
  - q) the deliberate concealment of any of the above matters; and/or
  - r) attempted victimisation or retaliation against someone who has disclosed malpractice.
- 3.2. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a Speak Up concern) you should report it under this policy.

- 3.3. This policy should not be used for complaints relating to your own personal circumstances, such as the way

you have been treated at work. In such cases you should refer the matter to the HR Department for it to be handled under the relevant internal policy and procedures.

- 3.4. If you are uncertain whether something is within the scope of this policy you should seek advice from the Speak Up Officers, whose contact details are at the end of this policy.

#### **4. RAISING A SPEAK UP CONCERN**

4.1. We hope that in many cases you will be able to raise any Speak Up concerns with your manager. You may tell them in person, or in writing. However, if you would prefer not to raise the issue with your manager or you feel that your manager has not addressed your concern adequately, you can raise your concern with:

- a more senior manager,
- your local human resources department,
- one of the Speak Up Officers, or
- through our external Safecall helpline using the contact details at the end of this policy.

4.2. The Speak Up Officers or Safecall handlers will arrange a meeting with you as soon as possible to discuss your concern. If you feel more comfortable having this meeting with a colleague or union representative present, this can be arranged provided your companion respects the confidentiality of your disclosure and any subsequent investigation.

4.3. Your concerns will be listened to, noted and a summary of your concern prepared, which you can have a copy of after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

#### **5. CAN I MAKE AN ANONYMOUS REPORT?**

5.1. We hope that you will feel able to voice Speak Up concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2. We would encourage you to let us know who you are. That allows us to come back to you as we assess and investigate the issues or concerns you are raising. However we recognise that individuals may sometimes have legitimate concerns about telling us who they are and so, if you wish to make an anonymous or semi-anonymous (where Safecall has your contact details but does not share these with us) report you may do so through our Safecall helpline. When you make a Speak Up report, we will discuss with you what appropriate measures can be taken to preserve confidentiality.

#### **6. INVESTIGATION AND OUTCOME**

6.1. Once you have raised a Speak Up concern, we will acknowledge receipt of your report within seven days. We will carry out an initial assessment to determine the scope of any investigation. You may be invited to attend additional meetings in order to provide further information.

6.2. In some cases, we may appoint an investigator(s), either internal or external, who has 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.

6.3. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any action taken as a result. You should treat any information about the investigation as confidential. We will provide final feedback within a reasonable timeframe not exceeding three months from acknowledgement of receipt of the report.

#### **7. IF YOU ARE NOT SATISFIED**

7.1. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly

and in an appropriate way. By using this policy, you can help us to achieve this.

**8. EXTERNAL DISCLOSURES**

- 8.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 8.2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We hope that you feel able to discuss your concerns internally first and we strongly encourage you to seek advice before reporting a concern to anyone external. Safecall operates a confidential helpline. Their contact details are at the end of this policy.
- 8.3. Speak Up concerns usually relate to the conduct of employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in Paragraph 4 for guidance.

**9. WHAT WILL BE THE EFFECT ON ME OF MAKING A SPEAK UP REPORT?**

- 9.1. It is understandable that individuals making Speak Up reports are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises a genuine concern under this policy, even if they turn out to be mistaken. However, if we conclude, following investigation, that you have maliciously made false allegations, then you may be subject to disciplinary action.
- 9.2. You will not suffer detrimental treatment as a result of raising a genuine concern, such as disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Speak Up Officer immediately.
- 9.3. Equally, you must not threaten or retaliate against an individual making a Speak Up report in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the individual could have a right to sue you personally for compensation in an employment tribunal.

**10. CONTACTS**

**Speak Up Officers**

Chris Chrysanthou  
Group General Counsel & Company Secretary  
00 44 1249 591078  
00 44 7917 834186  
chris.chrysanthou@alliancepharma.co.uk

Janice Timberlake  
Chief People & Infrastructure Officer  
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**Safecall Helpline**

(External reporting tool, independent of Alliance)

Telephone number lists:  
[www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)  
File a report online: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)