

## Whistleblowing / Speak-Up Policy

### *Living Our THREAD Values*

#### 1. Purpose and Commitment

Optimas OE Solutions Ltd (“Optimas”) is committed to conducting business ethically, responsibly, and in compliance with all applicable laws. An open and transparent culture is essential to this commitment.

This Whistleblowing / Speak-Up Policy encourages employees and relevant third parties to raise concerns about wrongdoing or misconduct without fear of retaliation. It supports Optimas’ THREAD values, in particular Honesty, Accountability, and Respect.

#### 2. Scope

This Policy applies to all employees, officers, and directors of Optimas; contractors, temporary workers, consultants, and agency staff; third parties acting on behalf of Optimas, where appropriate.

#### 3. What Should Be Reported

You are encouraged to speak up if you become aware of, or reasonably suspect, misconduct or wrongdoing, including but not limited to:

- breaches of law or regulation;
- bribery, corruption, fraud, or financial misconduct;
- violations of the Code of Conduct or company policies;
- human rights or labour-standards concerns;
- modern slavery or unethical supply-chain practices;
- health, safety, or environmental risks;
- misuse of confidential information or data;
- concealment of any of the above.

Concerns may relate to actions by Optimas, its employees, or third parties acting on its behalf.

#### 4. How to Raise a Concern

Optimas offers multiple channels for raising concerns. You may choose the option with which you feel most comfortable.

#### 4.1 Internal Reporting

Concerns may be raised with:

- your line manager
- Legal / Compliance
- Human Resources

#### 4.2 Independent Reporting Channel

Optimas provides an independent whistleblowing reporting channel to allow concerns to be raised confidentially or anonymously (where legally permitted).

Reports can be submitted via **EthicsPoint** (web-based reporting tool) (*accessible via the sharepoint or as otherwise communicated*)

This channel is operated by a third-party provider and is designed to protect confidentiality and, where chosen, anonymity.

#### 5. Anonymity and Confidentiality

- Reports may be made anonymously, where permitted by local law.
- All reports will be handled confidentially to the fullest extent possible.
- Information will be shared only with those who need to know in order to investigate and address the concern appropriately.

You are not expected to prove wrongdoing; however, reports should be made in good faith and based on reasonable belief.

#### 6. Non-Retaliation Commitment

Optimas has a zero-tolerance approach to retaliation.

No employee or individual will suffer dismissal, disciplinary action, demotion, intimidation, harassment, or any other disadvantage for raising a concern in good faith or cooperating in an investigation.

Any act of retaliation is itself considered a serious breach of company policy and may result in disciplinary action.

#### 7. Investigation and Outcome

All reported concerns will be assessed promptly and investigated in an appropriate, fair, and proportionate manner. Investigations will be conducted by appropriately qualified personnel.

Where misconduct is identified, suitable corrective or disciplinary action will be taken.

While confidentiality must be respected, Optimas aims to provide feedback to reporters where practicable.

## **8. Protection Under the Law**

This Policy is intended to support protections available under applicable whistleblowing laws, including the UK Public Interest Disclosure Act 1998.

Nothing in this Policy prevents individuals from making protected disclosures to regulators or authorities where permitted or required by law.

## **9. Our Expectation**

Speaking up is a responsibility shared by everyone at Optimas. By raising concerns, you help protect our people, our customers and suppliers, our reputation, and the integrity of our business.

### **Our Commitment**

By encouraging open dialogue and protecting those who speak up, Optimas OE Solutions Ltd reinforces a culture of trust, integrity, and accountability, consistent with our THREAD values.