

Public Grievance & Whistleblower Policy

External & Internal Stakeholders: V1.0_042026

1. Introduction

- 1.1 Tecknuovo Ltd (“Tecknuovo”, “we”, “us”) is committed to operating with integrity, transparency, and accountability. This policy sets out how individuals may raise concerns, complaints, grievances, or reports of wrongdoing relating to Tecknuovo’s activities, and how such concerns will be handled.
- 1.2 We are committed to ensuring that any person who raises a concern in good faith is listened to, is treated fairly and with respect, and is protected from retaliation.
- 1.3 This policy forms part of Tecknuovo’s wider ethical, compliance, and governance framework.

2. Scope

- 2.1 This policy is available to all stakeholders, including but not limited to employees and workers, professional contractors, freelancers, and associates, clients and customers, suppliers and delivery partners, business partners, and other third parties or members of the public who may be affected by Tecknuovo’s activities.
- 2.2 **Important note** – Whilst this public policy explains how concerns can be raised, stakeholder-specific procedures (for example, employee grievance procedures or associate complaints procedures) continue to apply and are referenced below.

3. What can be raised under this policy

- 3.1 Concerns may be raised where an individual reasonably believes there has been:
 - Ethical misconduct or lack of integrity
 - Breach of law or regulatory obligations
 - Fraud, bribery, corruption, or financial impropriety
 - Misuse of company or client assets
 - Risks to health and safety
 - Human rights concerns
 - Environmental harm or unsafe practices
 - Breaches of Tecknuovo’s policies or codes of conduct
 - Retaliation or improper treatment for raising concerns
- 3.2 **Exclusions** - Personal employment issues should normally be raised under Tecknuovo’s internal employee grievance procedure. Contractual or commercial disputes should normally follow the relevant contractual dispute resolution mechanisms.
- 3.3 If a matter contains elements of wrongdoing in the public interest, it may still be treated as whistleblowing, even if it arises in another context.

4. How to raise a concern (General)

- 4.1 Concerns may be raised by emailing compliance@tecknuovo.com.
- 4.2 Please include as much information as possible to help us understand and assess the issue (for example: dates, facts, parties involved, and any supporting evidence).
- 4.3 Where appropriate, concerns may be escalated to the Chief Legal & Operating Officer.
- 4.4 Please note that we have existing specific stakeholder routes to raise concerns, which take priority over the general route above:
 - **Employees:** may raise concerns under the internal Whistleblowing Policy or Employee Grievance Procedure.

- **Associates and consultants:** concerns will normally be handled in accordance with Tecknuovo's Complaints Procedure Policy for associates and consultants, available via the supplier portal or on request.

5. Confidentiality and Anonymity

- 5.1 We will treat all concerns sensitively and in confidence. Information will only be shared where necessary to investigate and address the concern.
- 5.2 Anonymous reports can be made; however, anonymity may limit our ability to investigate fully.
- 5.3 Where identity is known, we will make reasonable efforts to protect confidentiality.

6. How concerns are handled

- 6.1 All concerns raised under this policy will be:
 - 6.1.1 **Acknowledged** within a reasonable timeframe;
 - 6.1.2 **Assessed** to determine whether the issue falls within the scope of this policy;
 - 6.1.3 **Investigated** proportionately and fairly;
 - 6.1.4 **Responded to** with appropriate outcomes or actions; and
 - 6.1.5 **Escalated**, where necessary, to senior leadership or the Board.
- 6.2 All concerns raised in accordance with the published process will be acknowledged within 5 working days (unless submitted anonymously). Investigations will be completed, and a written response issued within 30 days of acknowledgement.
- 6.3 If a concern is not accepted under this policy, we will explain why.
- 6.4 Where any investigation determines that a third party (e.g., vendor, supplier, client) has acted unethically or illegally, we may elect to terminate our contract with the third party, report the matter to regulatory authorities (as applicable), and or prohibit any future collaboration with the third party.

7. Protection from retaliation

- 7.1 Tecknuovo has zero tolerance for retaliation.
- 7.2 No individual who raises a genuine concern in good faith will suffer dismissal, disciplinary action, loss of work, detrimental treatment, harassment, intimidation, or disadvantage.
- 7.3 Any person found to have retaliated against someone raising a concern may be subject to disciplinary or contractual action.

8. External Reporting

- 8.1 We encourage concerns to be raised internally first wherever possible. However, the law recognises that in certain circumstances concerns may be reported externally (for example, to regulators or prescribed bodies).
- 8.2 Independent whistleblowing advice is available from:
Protect (UK independent whistleblowing charity)
Website: <https://protect-advice.org.uk>
Advice line: 020 3117 2520

9. Responsibility

- 9.1 The Board has overall responsibility for this policy.
- 9.2 The effectiveness of grievance and whistleblowing arrangements is reviewed regularly.
- 9.3 Insights from concerns raised are used to improve our practices, controls, and culture

10. Policy Status

- 10.1 This policy does **not** form part of any contract of employment or contract for services.
- 10.2 This policy is reviewed at least annually and may be updated from time to time in connection with legal, regulatory, and/or organisation changes affecting our operations.

11. Contact

Questions about this policy may be directed to: compliance@tecknuovo.com.

12. Review and Publication Dates

Date: 15/04/2026

Reviewed: 15/04/2026

Next Review: 15/04/2027

13. Version Control

NUMBER	DESCRIPTION OF CHANGE	VERSION	DATE	CHANGED BY	APPROVED BY
1.	Initial Version	V1.0	042026		Sara McCracken (CLOO)