



Whistle Blowing Policy & Procedure

December 2024

Document Governance and Approval

Date	Person	Comments/approval
24/01/2024	Julie Eastty	Reviewed by CEO presented to Board for approval
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Version Control

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1. Purpose and Scope

This Policy applies to Molo Tech Limited (Molo) as a regulated entity and includes within its scope all legal entities that are consolidated into the accounts of Molo Tech Limited.

Molo Tech Limited is wholly owned subsidiary of ColCap Financial UK Limited.

This policy applies to **all Molo employees** and **most Molo suppliers** (specifically, all service providers that process, control or access personal data, including sourcing and outsourcing, processing arrangements and to the employees and agents of such providers).

Breaching laws and regulations, our Code of Conduct, or internal policies and procedures may have serious consequences for our company and our staff, our customers, shareholders and Business Partners, and may also have serious impact on the financial system or the public interest.

Effective detection and resolution of such conduct will help sustain our business and ensure long term value creation for all stakeholders. Molo’s Whistleblowing Policy demonstrates its commitment to staff and other stakeholders that it encourages escalation of any concerns regarding potential Misconduct and will not tolerate reprisal for making a good faith report of information that they believe is unlawful, unethical or otherwise improper conduct.

This policy includes the procedure for reporting suspected Misconduct, conducting an independent investigation, support and protection measures, and adequate follow-up of any recommendations for remedial action where an issue has been discovered.

2. Governance

The author of this policy is the Head of Compliance and the Head of Human Resources, and the Accountable Executive is the Chief Executive Officer.

It is owned and approved by the Board on the recommendation of the Management Committee.

Minor changes can be made by the author without approval from the owner.

The author should review this Policy annually and report to the Board, the results of their review, with any proposals for any required changes. In addition, the author should review this Policy at other times when there is substantial change in the Business or the risk or regulatory environment, or it becomes apparent that a change will be made.

The Head of Compliance shall be responsible for monitoring compliance with this policy and for providing appropriate management information to confirm adherence with the yearly review of this policy.

3. Introduction

Molo is committed to creating a safe, open and transparent workplace culture, where employees are encouraged to raise concerns at the earliest opportunity. Molo recognises that employees are often the first to realise that there may be something seriously wrong within an organisation.

The Whistle Blowing Policy is intended to cover serious public interest concerns that fall outside the scope of other procedures. These are that in the reasonable belief of the employee, the following matters are either happening now, have happened, or are likely to happen:

- A criminal offence
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of an individual
- Damage to the environment
- Deliberate covering up of/failing to report information tending to show any of the above

Examples of wrongdoing might include (but are not restricted to):

- Irregularities regarding accounting, internal accounting controls or auditing matters
- Money laundering or terrorist financing
- Market manipulation, insider dealing, unlawful disclosure of inside information
- Tax evasion and questionable or unfair tax avoidance practices
- Unlawful access to or use of company data or attempted data protection breaches
- Bribery and corruption
- Human rights violations
- A violation of competition law
- Discrimination and harassment
- Retaliation against any person for speaking up or becoming otherwise involved under this policy
- The deliberate concealment, destruction or manipulation of information regarding the above

- Any other matters you consider Misconduct

3.1. Your Safety

The Board and the Chief Executive Officer are committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any detriment (such as reprisal or victimisation). Provided you are acting in good faith (effectively this means honestly), it does not matter if you are genuinely mistaken or if there is an innocent explanation for your concerns. This assurance is not extended to those who maliciously raise a matter they know is untrue. If, following a thorough investigation, it is found that you raised a matter maliciously; this will be dealt with under the Molo's Disciplinary Policy.

3.2. Your Confidence/Anonymity

With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you do not wish to disclose your identity, this will not be done without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential (for example in court cases). In such cases, we will discuss with you whether and how the matter can best proceed.

Please remember that if you do not tell us who you are it will be much more difficult to look into the matter. We will not be able to protect your position or to give feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

Where an individual does not wish to come forward as a witness, the Trust retains the right to pursue the matter further but will respect the anonymity of the individual. However, it must be noted that this may ultimately prevent the Trust from being able to proceed.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Trust. In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

The procedures contained below should ensure that your concern can be addressed and dealt with internally, however if you believe that a disclosure of information should be made externally in the public interest this should be soundly based and you should first seek independent and/or specialist advice.

IF IN DOUBT – RAISE IT!

4. Roles and Responsibilities

All employees of Molo are expected and encouraged to report suspected Misconduct within Molo. Any issues that may have serious consequences for Molo or its stakeholders, must be reported as soon as possible so we can respond quickly and deal with the situation appropriately. If you have observed unlawful, unethical or otherwise improper conduct, or you suspect that such conduct has occurred, is occurring or is likely to occur, it is your responsibility to speak up using one of the internal reporting channels outlined in this policy.

The following table sets out the roles and responsibilities within Molo.

Functions/title	Role	Responsibility
Board	The Board is responsible and accountable for this Whistleblowing Policy and Procedure.	The Board will demonstrate commitment to developing an open culture within the organisation, through actions and strategy The Board will receive and review annual reports on whistleblowing activity and appoint Whistleblowing Champions
Whistleblowing Champions	Whistleblowing Champions have lead responsibility for the whistleblowing procedure and for dealing with issues raised	<ul style="list-style-type: none"> ● oversee and review the whistleblowing policy and procedure ● provide advice and support to managers and employees ● ensure learning from whistleblowing cases is fed back to the wider organisation ● ensure managers are trained in dealing with issues ● investigate issues raised with them directly promptly and thoroughly ● inform all reported disclosures to the CEO and the actions being taken ● provide reports on whistleblowing activity on an annual basis to the senior management team.
Business Area Managers	Responsible for ensuring all staff are aware of this policy and procedure and their responsibilities and fostering an open culture within their teams	<ul style="list-style-type: none"> ● escalating issues and engaging the support of designated officer/s where required ● ensuring any whistleblower is not subject to detriment
Employees	All staff have a duty to report wrongdoing (whistleblow) under the circumstances set out in this policy	

4.1. Whistleblowing Champions

The following people have been nominated and agreed by Molo as designated officers for concerns under this procedure:

Matt Kimber	CEO	Matt.kimber@molofinance.com
Julie Eastty	Head of Compliance	Julie.eastty@molofinance.com
Sharon Sohal / Lauren Clough	Head of People	Sharon.sohal@molofinance.com

These designated officers will act as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation.

All these people have been given special responsibility for dealing with whistleblowing concerns and will give you information about where you can go for more support. They will:

- treat the concern confidentially unless otherwise agreed
- ensure the staff member receives timely support to progress their concern
- escalate to senior management any indications that the staff member is being subjected to detriment for raising their concern
- remind the organisation of the need to give the staff member timely feedback on how their concern is being dealt with
- ensure the staff member has access to personal support as it is recognised that raising such a concern may be stressful.

5. Risks

Risk is set and defined by the Board. Molo's risk appetite is considered to be risk adverse in relation to regulatory compliance and aims to achieve full compliance with all rules and regulations appropriately through the policy governance framework and corporate governance structure including relevant committees.

This policy and supporting procedures aim to mitigate the following risks:

- Allegations of whistleblowing are not referred, assessed, investigated and managed appropriately resulting in financial and reputational damage and legal recourse.

6. Whistle Blowing Procedure

6.1 How to raise a concern

Speaking up means raising your concern in whatever way you feel most comfortable. If you suspect Misconduct you are expected to speak up and bring it to the attention of management as soon as possible. Concerns may also be raised externally; however, Molo encourages staff to report internally where possible.

Internal Reporting Channels

You should always use local reporting lines and procedures first, if possible. There may be situations in which

you may consider the regular reporting lines inappropriate to the circumstances, for reasons such as the following:

- Management is involved in, or knowingly tolerates the Misconduct
- Your concern was not taken seriously, appropriately addressed or adequately resolved
- You were discouraged to report your concern, or were told to remain silent
- You fear or have suffered reprisal for raising a concern

If, depending on the seriousness and sensitivity of your concern and who is involved in the Misconduct, you are uncomfortable raising your concern through the normal reporting channels, you should consider raising through a Whistleblowing Officer, HR or the Board.

External reporting channels

We encourage you to report and consult within Molo. If your concern remains unaddressed, or if it is not reasonably possible to report internally, nothing in this policy prevents you from raising your concerns to the appropriate regulatory authority, law enforcement agency, or other relevant external body or from obtaining independent counsel. See also section 6.5.

When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, harassment and bullying or other relevant procedure, we will inform you accordingly.

6.2. What information should you provide

To assist in the assessment and any subsequent investigation of your report, you should include as much information as possible about the suspected Misconduct. This will help us to better assess the situation and determine how to proceed.

The following information will be useful to include in your report:

- Your name, location and contact details (preferred, but you may choose to stay anonymous).
- The nature of the suspected Misconduct.
- Why it is a concern for you?
- When and where did (the suspected) the Misconduct occurred.
- Who was involved?
- If there were any witnesses, and if so, who they are
- If you did anything in response to the Misconduct
- Whether you have already raised a concern with anyone and their response.
- Any evidence that supports your report, and where the evidence is located.
- Any further information that could help investigate your report.
- If you are concerned about possible reprisal for raising a concern.

6.3. Investigation Process

Our internal investigation process consists of four stages:

Stage 1 - Preliminary assessment

Stage 2 - Detailed investigation

Stage 3 - Reporting

Stage 4 - Decision and follow-up

6.3.1. Stage 1 – Preliminary Assessment

Within 5 working days of receipt of a report, the Whistleblowing Officer will conduct a preliminary assessment to find out which issues are raised by the report, whether it falls within the scope of this policy, and to determine the potential impact.

The next step is to determine whether or not a detailed investigation should be undertaken and by whom.

Not all reports of suspected Misconduct require a detailed investigation. If there appears to be a simple solution to your concern, or in case of a misunderstanding, the issue may be solved or clarified, without further investigation.

The Whistleblowing Officer may also determine that your report will not be investigated for other reasons. For instance, if your concern falls outside the scope of this policy, if there are insufficient grounds on which to proceed, or the matter has been previously investigated. In such cases the matter will be closed and you will be informed.

If there are sufficient grounds to proceed with a formal investigation, the Whistleblowing Officer will arrange an initial interview which will, if requested, be confidential to ascertain the areas of concern. At this stage, you will be asked whether you wish your identity to be disclosed and will be reassured about protection from possible victimisation. You will also be asked if you wish to make a written statement. In either case, the designated officer will write a brief summary of the interview, which will be agreed by both parties.

6.3.2. Stage 2 - Detailed investigation

If the concern raised is very serious or complex, a formal investigation may be held. The investigation may need to be carried out under the terms of strict confidentiality i.e. by not informing the subject of the complaint until it becomes necessary to do so.

The purpose of an investigation is to collect evidence to reach a conclusion about whether the suspected conduct has occurred. This is accomplished by interviewing people, reviewing records and collecting data, information and documentation.

The Whistleblowing Officer may consult or request all documents that she/he reasonably believes necessary to carry out the investigation. Interviews are conducted with individuals who may have knowledge of the concern. Their statements will be recorded in writing and shall be presented to them to obtain their approval and signature. The Whistleblowing Officer must properly secure and safeguard all data, information and documentation obtained during the investigation to prevent it from being lost, stolen, manipulated, or accessed without proper authorization.

6.3.3. Stage 3 - Reporting

The Whistleblowing Officer will prepare a written report which outlines the issues which were investigated, the evidence collected, and the findings. The investigation report will also set out whether there were any concerns about, or any evidence of detrimental action taken against you, or other persons involved in the investigation, and the response.

The Whistleblowing Officer may make a recommendation whether any further action may be necessary or useful. The Whistleblowing Officer may recommend a formal action (such as initiating a disciplinary hearing, improving policies and procedures, strengthening internal controls, or to mitigate identified risks), an informal action, (for instance, training, coaching, or mediation), or recommend that no further action is

required. Distribution of the investigation report must be limited to those who have a strict need to know.

6.3.4. Stage 4 – Decision and follow up

The Whistleblowing Officer will keep the member of staff informed about the investigation and its outcome.

The matter will be dealt with promptly at each stage. Where appropriate, immediate steps will be taken to remedy the situation as soon as practicably possible. In the event of a justified suspicion of a criminal offence we will refer the matter to local law enforcement agencies for possible prosecution. A final outcome may take more time but a final resolution/outcome at each stage should be available within ten working days.

If the result of the investigation is that there is a case to be answered by any individual, Molo's Disciplinary Policy will be used and the details discovered by the formal investigation, transferred to that process.

Where there is no case to answer, but the employee held a genuine concern and was not acting maliciously, the designated officer will ensure that the employee suffers no reprisals.

If there is no case to answer but there is evidence that the allegation was made frivolously, maliciously or for personal gain, disciplinary action will be taken against the complainant.

If, after careful consideration, a member of staff believes that their concern or a concern raised against you, has not been handled in an objective, impartial and unbiased manner, or the investigation or subsequent action was inadequate, you may request the Board for a review. Your request should explain why you consider a review necessary. If your request is approved, the Board will conduct the review and may contact you for additional information. This will normally not be a new investigation, but an examination of the report intake and/or the investigation process, or a review of the data, information and documentation, collected during the report intake and/or investigation process.

6.4. Complaints about the Chief Executive

In the event that the concern is about the Chief Executive, this concern should be made to the Chair of the Board, by either the member of staff, their manager or a Whistleblowing Officer, who will decide on how the investigation will proceed.

6.5. Raising Concerns with outside bodies

The purpose of this policy is to ensure that staff are aware of the way to raise their concerns in-house and for staff to see that action is taken promptly to remedy a particular situation. It is hoped that this procedure will give staff the confidence to raise concerns internally.

However, it is recognised that there may be circumstances where staff may feel they wish to report matters to outside bodies. You may consider to making an (external) disclosure if, despite internal reporting, your report of suspected Misconduct remains unaddressed, for instance in cases where the breach was not appropriately assessed or investigated, or no appropriate remedial action was taken within three months after you reported the concern.

If members of staff are contemplating making a wider disclosure, they are strongly advised to first seek further specialist guidance from professional or other representative bodies.

Concerns can be raised via the whistleblowing charity Protect who can raise concerns on the whistleblower's behalf.

Protect can be contacted on:

Telephone: 0800 221 8703,

Email: advice60@protect-advice.org.uk

Website: Advice Line | Protect - Speak up stop harm (protectadvice.org.uk).

Concerns can be raised directly to the FCA on:

Telephone: 0207 066 9200

Email: whistle@fca.co.uk

Website: Whistleblowing | FCA.

7. Data retention

Personal data processed under the Whistleblowing policy will be deleted, promptly, when no longer necessary or appropriate. Personal data will usually be removed securely through redaction within 6 months of completion of the investigation, unless disciplinary measures or legal proceedings are initiated against the person involved in the Misconduct, or the person who deliberately made a false or malicious report. In such cases, personal data will be kept until 6 months after the conclusion of these proceedings and the period allowed for any appeal. In certain situations, Molo may have a legitimate interest to extend the duration of the aforementioned retention periods, for example, where this is necessary to comply with an applicable legal obligation, or for retaliation monitoring purposes whereby a prior assessment has indicated a potential risk of reprisal. To ensure that the reporter, witnesses and other persons involved in an investigation are effectively protected against reprisals during and after an investigation has been concluded, the aforementioned retention periods will be extended with an additional 12 months.

8. Reporting

On an annual basis the Head of Compliance shall provide a report to the Board on all whistleblowing reports during the period. This includes the numbers and types of reports, the number and status of investigations, the outcomes (including remedial and disciplinary action taken in response to investigation findings and recommendations), and details of any support provided, and measures taken to protect individuals from reprisal. Reported concerns carrying a significant or undue amount of risk will be reported up without delay.