



TENTH REVOLUTION

Whistleblowing Statement - Global

This statement describes the policies observed by all companies under the Tenth Revolution Group \ ('the Group') umbrella. These include Frank Recruitment Group and Revolent Group.

April 2024

Overview

Tenth Revolution Group ('the Group') is a global leader in tech talent services. Through our portfolio of companies, we deliver a range of services to organisations looking to build their workforce or utilise additional resources for cloud implementation.

It is our policy to conduct all our business in an honest and ethical manner. We believe that all employees should have a safe way to report any concerns about suspected wrongdoing.

Purpose

The purpose of this statement is to set out our responsibilities as a company, and our employees' and suppliers' responsibilities, in regard to whistleblowing. It contains details on how employees and suppliers can access whistleblowing services.



Scope

This Statement covers all employees of the Group, including all levels and grades, whether permanent, fixed-term or temporary (collectively referred to as “employees” in this statement). This Statement also covers suppliers, vendors, and clients of the Group.


We are bound by various laws in respect of our conduct in the territories where we operate. This statement covers all dealings with clients, partners, umbrella companies, suppliers, management companies, candidates and any other person our employees deal with, regardless of where they originate.



What our internal policy covers

- We are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards.
- The law recognizes that in some circumstances it may be appropriate for employees to report concerns to an external body such as a regulator.
- Where whistleblowing concerns are raised within the Group, every effort will be made to keep the identity of the whistle blower secret and only reveal where it is necessary to those involved in investigation the concerns raised.
- All employees have access to further details of how to raise a concern, points of escalation and their rights.





The Group encourages openness and will support whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken. Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine concern.

Any employee who threatens or retaliates against whistleblowers in any way may be subject to disciplinary action.

Reporting and Investigation

The Group encourages you to report any actual, threatened or imminent violation of any law, accounting standard, Group policy or unethical or fraudulent business practices by any Group employee, Board member, supplier, vendor, client, candidate, management company or umbrella company (each a “Reportable Event”).

If you believe that any Reportable Event has occurred or is occurring or you have a good faith concern regarding conduct that you reasonably believe may be a Reportable Event, we encourage you to promptly take one or more of the following actions:

- Discuss the situation with your manager or Group point of contact;
- If you are uncomfortable speaking with your manager or Group point of contact, believe your manager or Group point of contact has not properly handled any prior reports made by you or a colleague or if you believe your manager or Group point of contact is involved in the Reportable Event, please contact the Group’s Global HR Director (**email: hr@frankgroup.com**) or the Chief Legal Officer (**email: legalnoticesusa@frankgroup.com**) directly;
- If you do not believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, report your concern using one of the methods listed below, through which you may choose to identify yourself or remain anonymous:

By mail to:

If in the US, Tenth Revolution Group, 2001 Market Street, 11th Floor, Philadelphia, PA 19103, **Attn: Chief Legal Officer**

If outside of the US, Tenth Revolution Group, 6th Floor, Plantation Place South, 60 Great Tower Street, London, UK, EC3R 5AZ

Attn: Global HR Director

By email to:

d.liebman@tenthrevolution.com

(Chief Legal Officer)

and **c.walker@tenthrevolution.com**

(Global HR Director)

Via our third party provided toll free hotline by phone at **833-940-2875**

(if in US), **011-44-808-189-0041** (if in UK)

and **800-603-2869**

(if in any other country - must dial country access code before dialing “800”),

via email at:

reports@lighthouse-services.com

(must include company name with report)

www.lighthouse-services.com/frankgroup

Reporting and Investigation

This Policy provides a mechanism for the Group to be made aware of any alleged wrongdoings and address them as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to the Group through the ethics or reporting hotline or any other reporting method specified in this Policy.

If you file a report under this Policy, the Group will acknowledge receipt of the report within a reasonable period following receipt, if you supply an address for response.

The Group takes all reports seriously and will promptly and thoroughly investigate the matter. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation.

If the investigation of a report made hereunder confirms or provides evidence of any violation of any law, accounting standard, Group policy or of any unethical or fraudulent business practices, the Group will take prompt corrective action proportionate to the seriousness of the offense. This action may include a change in accounting practice, a change in business practice, a change in organizational structure or the issuance of disciplinary action, up to and including termination of employment or any other working relationship that the offending party may have with the Group. Reasonable and necessary steps will also be taken to prevent any further violations, unethical behavior or fraudulent practices.

However, a party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report under this Policy may face disciplinary action, up to and including termination of employment or other legal proceedings.

Handling Reports

Please make your report as detailed as possible, including the names of all individuals involved and any witnesses and specific facts and circumstances. If you do not possess many facts or details but have a good faith basis to believe that a Reportable Event has occurred, is occurred or is imminently about to occur, that's okay, please file the Reportable Event anyway and the Group will investigate.

The Legal Department and the Human Resources Department will be primarily responsible for investigating all Reportable Events and will discuss the results of the investigation with the appropriate member(s) of the C-Suite, Board members and external experts as each investigation warrants. Based on the type and nature of the Reportable Event, the Group will involve necessary internal and external subject matter experts to properly investigate the report. The Group will involve the Chief Financial Officer in its investigation of any Reportable Event related to any financial or accounting matters.

Please note that each investigation and Reportable Event are different and unique, will vary in complexity and investigative techniques utilized. Therefore, the time to resolve each Reportable Event, and the corrective measures taken, if any, may vary widely. To the extent possible and permissible under applicable law, the Group will endeavour to keep you informed of the status of the investigation.

Confidentiality

Information disclosed during the course of an investigation conducted hereunder will, to the extent practical and appropriate, remain confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law.

Nothing in this Policy in any way prohibits or is intended to restrict or impede employees from discussing the terms and conditions of their employment with co-workers or exercising protected rights to the extent that such rights cannot be waived by agreement, or otherwise disclosing information as permitted by law.



No Retaliation/Protection and Support of Whistleblowers

The Group strictly prohibits and does not tolerate unlawful retaliation against any employee, officer or director for filing a Reportable Event hereunder in good faith or otherwise cooperating in an investigation of Reportable Event. All forms of unlawful retaliation are prohibited, including any form of adverse action, discipline, threats, intimidation, or other form of retaliation for reporting under or complying with this Policy. The Group considers retaliation itself to be a violation of this Policy, which will result in disciplinary action, up to and including termination of employment.

If you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to an alleged Reportable Event, please immediately report the alleged retaliation via any of the methods listed in the “Reporting and Investigation” section above, ideally within five (5) days of the offending conduct.

Your complaint should be as detailed as possible, including the names of all individuals involved and any witnesses. The Group will directly and thoroughly investigate the facts and circumstances of all perceived retaliation and will take prompt corrective action, if appropriate.

Additionally, any manager or supervisor who observes retaliatory conduct must report the conduct via any of the methods listed in the “Reporting and Investigation” section above so that an investigation can be made and corrective action taken, if appropriate.

Bringing any alleged retaliation to our attention promptly enables us to honor our values, and to promptly and appropriately investigate the reported retaliation in accordance with the procedures outlined above.

Any employee, regardless of position or title, who has been determined to have engaged in retaliation in violation of this Policy, will be subject to appropriate disciplinary action, up to and including termination of employment.

Modification

The Group expressly reserves the right to change, modify or delete the provisions of this Policy without notice.

Governance and oversight

This Statement is ultimately governed by the Tenth Revolution Group Executive Board.

Signed: Lewis Miller, Chief Financial Officer and TRG Executive Board member

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