

# Whistleblowing Policy

## Section 1: Our Purpose

### 1.1 Our Goals & Commitment

At ICON, our company values guide how we conduct ourselves and interact with colleagues, clients, and partners. In alignment with these values, we encourage open feedback and provide a safe space for individuals to report any activities or behaviours that appear unethical or inconsistent with our principles.

This policy establishes clear guidelines on how we manage and respond to such reports. Through our whistleblowing framework, we aim to:

- Provide employees with a secure, anonymous platform to report misconduct.
- Ensure all reports are taken seriously, thoroughly investigated, and acted upon.
- Protect the anonymity of informants, requiring identity disclosure only at their discretion.
- Document and review all investigations, offering feedback where appropriate.

### 1.2 Our Commitment

ICON is dedicated to fostering a transparent and accountable work environment. We want employees to feel confident in reporting concerns, understand the reporting process, and feel secure in doing so. Additionally, we emphasize the right to anonymity and commit to preventing any retaliation or mistreatment against whistleblowers.

### 1.3 Reportable Conduct

Under this policy, we encourage reporting of any behaviour that:

- Is dishonest, fraudulent, or corrupt.
- Involves illegal activity, such as theft, drug-related offenses, violence, or property damage.
- Violates ethical standards, including breaches of ICON policies such as the Code of Conduct.
- Demonstrates gross negligence or oppressive conduct.
- May cause financial or reputational harm to ICON, its employees, or third parties.
- Represents a risk to public safety or the financial system.
- Involves harassment, discrimination, victimization, or bullying.

Reports that do not fall within the definition of reportable conduct may not qualify for protection under relevant legislation. However, each report will be assessed appropriately.

## 1.4 Policy Scope

This policy applies to all individuals associated with ICON, including:

- Employees (directors, managers, and interns included)
- Contractors
- Consultants
- Host families

It is applicable across all locations where ICON operates.

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## Section 2: Reporting Process

### 2.1 Reporting Channels

Employees can report concerns through the following Whistleblower Protection Officers:

#### Case Managers:

- Helen Zhao – [helen.zhao@iconedu.co.uk](mailto:helen.zhao@iconedu.co.uk)
- Zoe Ni – [zoe.ni@iconedu.co.uk](mailto:zoe.ni@iconedu.co.uk)

#### Duty Manager:

- Linda De Lay – [linda.delay@iconedu.co.uk](mailto:linda.delay@iconedu.co.uk)

### 2.2 Anonymity Assurance

ICON fully respects and safeguards the anonymity of whistleblowers. Individuals can choose to remain anonymous during and after the reporting process. At no point will they be required to disclose their identity unless they choose to do so.

If an informant chooses to disclose their identity, ICON will limit access to this information to only those necessary for handling the report. Stringent measures will be in place to prevent retaliation.

### 2.3 Investigation Process

ICON is committed to conducting a transparent and thorough investigative process. The steps include:

- Receiving and acknowledging the report (anonymous or otherwise).
- Assigning a case manager to assess and confirm the report.
- Conducting an initial review to determine validity and obtaining permission to proceed.

- Investigating the matter, with possible engagement with the informant (if communication is possible).
- Providing updates to management and the informant, as per policy guidelines.
- Concluding the investigation, documenting findings, and informing relevant stakeholders.
- Escalating findings to management for any necessary actions.

Through this process, ICON aims to ensure all concerns are addressed responsibly and fairly, reinforcing our commitment to ethical business practices.

## 2.4 External Whistleblowing Contacts

If you do not feel able to raise child protection concerns internally, you can contact the following external services for confidential advice and support:

- NSPCC Whistleblowing Helpline  
Tel: 0800 028 0285 (available Monday to Friday, 8am–8pm)  
Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Protect (formerly Public Concern at Work)  
A free and confidential advice service for employees considering whistleblowing.  
Tel: 020 3117 2520  
Website: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

These services are independent and available to support you if you are unsure about how to proceed or feel unsafe raising your concerns internally.

This policy reviewed on 3<sup>rd</sup> April 2025, next review date is 2<sup>nd</sup> April 2026.