



## UNITED GROUP INTEGRITY HELPLINE

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## 1. ABOUT THE INTEGRITY HELPLINE

### 1.1 What is United Group's Integrity Helpline?

- The Integrity Helpline is a confidential reporting tool for your use, created by and ran by a third party - NAVEX (using their EthicsPoint software).
- The Integrity Helpline helps us work together in addressing fraud, abuse, and other misconduct in the workplace, while cultivating a positive work environment.
- You can access the Integrity Helpline online, by telephone, or via your mobile.

### 1.2 Why do we need an Integrity Helpline?

- United Group must protect its legitimate business interests, which include, protecting the business from crime and regulatory violations.
- It is a legal requirement for companies registered within the European Union to make confidential reporting channels available – and United Group is registered in the EU.
- United Group is firmly committed to maintaining the highest standards of ethics, honesty, openness, and accountability. Upholding these ethical commitments is essential to our continued success. United Group recognizes that **you** – and all of its employees and contractors - have an important role to play in achieving this goal.
- By creating open channels of communication, we can promote a positive work environment and maximize productivity.

### 1.3 Who can report on the Integrity Helpline?

- All United Group employees (including casual, temporary agency staff, freelancers, trainees, home workers and contractors) as well its third parties (including suppliers, vendors, consultants, business partners) can use the Integrity Helpline.

### 1.4 Why should I report what I know?

- United Group encourages an open culture in all its dealings between staff, managers, and all people with whom it comes into contact.
- Corporate misconduct can threaten the livelihood of any employee or an entire affiliated entities of the United Group – or even United Group itself. Effective and honest communication is essential if misconduct is to be effectively dealt with.

- Whilst we encourage you to first report your concerns internally to either the Compliance or the HR functions, we recognize, you may not feel comfortable doing this in certain situations, thus, you may find it easier to report concerns through the Integrity Helpline instead.

### 1.5 Does management really want me to report?

- We certainly do. In fact, we expect you to report misconduct as part of your responsibilities as an employee. We are proud of our culture, and we want to keep being proud of our culture - Your reporting can minimize the potential negative impact on the company and our people of misconduct and keep our business ethical.
- Ethical business improves our culture and performance.

### 1.6 If I see a violation, shouldn't I just report it to my manager, compliance or HR?

- Yes, ideally you should bring any concerns forward to your direct manager, the Local Compliance Officer, or other member of your local management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner – for example, when someone in your reporting line is involved in the issue you are reporting. In such circumstances, some people feel more comfortable reporting to an external Hotline provider.

## 2. REPORTING PROCEDURE

### 2.1 What should I do before submitting a report?

- First consider if you are able to report the matter to local HR or local Compliance Officer or Group Head of Compliance. You are also welcome to email [compliance@united.group](mailto:compliance@united.group) at any time.
- If you feel unable to do this, read the [Protected Disclosure Policy](#) before making a whistleblowing report.
- If you have any evidence to support your report, please do collect it. The Integrity Helpline website and application have an upload facility. Call handlers on the telephone will also be able to help you upload documents.

### 2.2 May I report using either the Internet, the telephone, or a mobile?

- Yes. United Group's Integrity Helpline gives you the ability to file a confidential report via either the telephone, mobile, or the Internet.



- If using a telephone, you will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into United Group's Integrity Helpline Web site. These reports have the same security and confidentiality measures applied to them during delivery.

### 2.3 Can I speak in my native language?

- Yes – NAVEX has interpreters that are available for you to speak in all the main languages spoken at United Group. If you use the Internet service, your report will be translated into English for you after you have submitted it.

### 2.4 What if I forget something or UG has further questions for me concerning my report?

- When you file a report, you will be given a unique pin which will be your reference
- You can return to the Integrity Helpline system again either by Internet, mobile, or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues.
- We suggest that you return to the site in the time specified to answer any questions we may have for you.
- You and United Group can have a “confidential dialogue”, where situations are not only identified, but can also be resolved, no matter how complex.

## 3. TOPICS TO REPORT

### 3.1 What type of situations can I report?

- Here is a list of those issues you may submit a report about (legal restrictions may apply).
  - **Financial issues:** (Theft and embezzlement, money laundering, tax evasion, accounting manipulation, non-compliance with internal control procedures, conflict of interest and any other kind of financial fraud; financial or contract document forgery, as well as non-compliance with financial regulation. Concealment of any of the above).
  - **Fraudulent business conduct:** (Payments of bribery or facilitation payments to private or public officials, corruption, improper sponsorships, donations, gifts and entertainment, violation of competition laws or insider dealing; conflict of interests and other inappropriate business conduct. Falsification of contracts, reports or records. Concealment of any of the above).
  - **Auditing:** (Any intentional misrepresentation of information, undue influence or independence concerns relating to interactions with external or internal auditors, or the oversight of audit functions of activities. Including questionable practices relating to:

accounting, auditing or internal financial controls (examples include: tax evasion, misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of accounting principles, wrongful transactions). Concealment of any of the above).

- **Serious offences resulting from violations of the European Convention of Human rights and gross human rights abuses:** (including the rights of freedom from slavery, protection from trafficking, right to liberty and privacy, freedom from discrimination).
- **Serious matters of discrimination, harassment or retaliation:** (Discrimination due to sexual orientation, gender, race, religion and sexual harassment. Retaliation for making a report).
- **Serious environment, health and safety breaches:** (Environmental pollution, serious failure to observe safe working practices, unsafe working conditions, and company violations affecting the health and safety of individuals at work. Violence or threats to personal safety).
- **Serious Cyber-crimes committed against our businesses:** (data leaks/thefts, deliberate sabotage through computer viruses or damage to our technical and electronic equipment (including computers and digital panels/screens). **In the event of a data security breach and threats to our electronic equipment, the Information Security Team has a preferred Breach procedure for urgent matters so that they can secure the system. You can email the team directly at [cybersec@united.group](mailto:cybersec@united.group).**
- You may also report any concealment of the above.

### 3.2 My report doesn't cover any of those topics – what should I do?

- If you feel that the definitions above do not describe the event, action or situation you are looking to report on, and the event, action or situation is of sufficient seriousness, you may report the matter provided it relates to:
  - a crime or offence;
  - a serious violation of laws or regulations;
  - a miscarriage of justice; or,
  - poses a serious threat or damage to the public interest.

### 3.3 I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

- You may wish to speak to your local HR, local compliance officer, or Group Compliance at [compliance@united.group](mailto:compliance@united.group).



- If you prefer not to then go ahead and file a report.
- NAVEX EthicsPoint call handlers can help you prepare and file your report so it can be properly understood.
- We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.
- Give as much information as possible in your report. United Group will use that information to determine whether a reported concern is a violation.
- If you do not knowingly make a false report, you can speak openly without fear of dismissal, discrimination, harassment, intimidation or of any other adverse impact. We do not tolerate retaliation in any form. Anyone who does retaliate against a team member on those grounds faces disciplinary action, up to and including termination.

#### 4. CONFIDENTIALITY

##### 4.1 Where do these reports go? Who can access them?

- Reports are entered directly on the NAVEX EthicsPoint secure server to prevent any possible breach in security.
- NAVEX EthicsPoint makes these reports available to the Group Head of Compliance, or the Group General Counsel if the Group Head of Compliance is mentioned in the report, who may delegate responsibility for investigating the report.
- Each of these report recipients will have had training in keeping these reports in the utmost confidence and must follow [United Group Investigation Protocol](#).
- A party incriminated in the report will **never** be involved in the investigation of that report.

##### 4.2 Will my identity remain confidential?

- Yes. We have legal obligations to protect every whistle-blower's identity.
- We will not share your identity with any party directly or indirectly incriminated in your report and shall protect you in accordance with the Protected Disclosure Policy.
- If a situation arises where it is not possible to deal with the concern without revealing your identity, for example, due to legal reasons, we will inform you of this and make provisions around that scenario to ensure it is not to your detriment.

### 4.3 Can I make an anonymous report?

- We encourage reporters to share their identity with us so we can ensure that they are offered help and guidance during the whistle-blowing procedure.
- It is also helpful if we need to contact you about anything or ensure your safety.
- However, you *may* prefer to remain anonymous, this option is available except where we are not permitted by law to process anonymous reports. If this legal situation changes, we shall reflect the law accordingly.

### 4.4 Will I be protected for making a report?

- United Group's Leadership is committed to our **Protected Disclosure Policy**.
- If you raise a genuine concern, you will not be at risk of damaging your position as a result.
- Provided you are acting in good faith, it does not matter whether or not your concern proves to be well founded.
- United Group will not tolerate the victimization of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action.
- If you feel victimized for making a report it is important you speak to us via the Hotline or at **[compliance@united.group](mailto:compliance@united.group)**.

### 4.5 I thought that my company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

- The NAVEX EthicsPoint system does not generate or maintain any computer internal connection logs with IP addresses, so no information linking your PC to your report is available.
- This is the case whether you use a work, home or publicly located computer to make a report.

## 5. OTHER CONCERNS

### 5.1 How will my concern be handled?

- Once you have reported your concern, United Group Management Team will carry out the appropriate enquiries and/or investigations and assess what action should be taken, and then arrange for the implementation of the appropriate actions.
- You should read the **Protected Disclosure Policy** and the **Investigation Protocol** for further information on how we handle a report.





## 5.2 What if I am not satisfied with the outcome of my report?

- If you are unhappy with United Group’s Management Team’s response, you can tell us via the Integrity Helpline. The details are further provided in the [Protected Disclosure Policy](#).

## 5.3 What if my boss or other managers are involved in a violation? Won’t they get the report and start a cover-up?

- We take reports very seriously.
- United Group’s Integrity Helpline system and report distribution, and our [Investigation Protocol](#) are designed so that implicated parties cannot affect the investigation of them.
- Implicated parties are not notified or granted access to reports in which they have been named until the investigation has reached a point where that individual has the right to respond to the allegations. Your identity will be protected at all times.