Whistleblowing Policy

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Version** | **Issued** | **Revised** | **Next review due** | **Owner** |
| 1.1 | (London) | 16.07.25 | 30.04.2026 | AMDAP ESG Leadership Group |

1. Scope

This policy applies to all individuals working for or with PADMA, including employees (full-time, part-time, and temporary), contractors, consultants, agency workers, and any other individuals performing work for or on behalf of PADMA in any of its global locations.

1. Purpose

This global policy provides the overarching framework for whistleblowing within PADMA. PADMA’s Employee Suggestion and Grievance Policy is provided for general workplace issues. The Whistleblowing Policy is intended to provide a route for reporting concerns about serious wrongdoing.

2.1 This policy aims to enable and encourage all individuals working for or with PADMA, regardless of their location, to raise genuine concerns about potential wrongdoing within the organisation. PADMA is committed to fostering a culture of transparency and accountability, where concerns can be raised safely and are investigated in a timely and effective manner.

2.2 This policy recognises the importance of protecting individuals who raise legitimate concerns in good faith. PADMA will not tolerate any form of retaliation or detriment against anyone who reports a concern under this policy.

2.3. While this policy sets out PADMA's global framework for raising concerns, it is intended to be interpreted and applied in accordance with applicable local laws and regulations in each country where PADMA operates, including Europe, the United Kingdom, and Bangladesh. Where local laws provide for specific protections or procedures for whistleblowing, PADMA will adhere to those requirements.

1. Definitions

**Whistleblowing:** The act of raising a genuine concern about potential wrongdoing, illegal or unethical conduct, or breaches of policy within or by an organisation.

**Whistleblower:** An individual who raises a genuine concern about potential wrongdoing, illegal or unethical conduct, or breaches of policy within or by an organisation

1. Our Commitment

PADMA is committed to providing workplaces where all employees feel safe and empowered to voice suggestions and raise concerns. We are committed to the highest possible standards of operation and legal compliance.

PADMA is dedicated to ensuring that all feedback is treated seriously, investigated fairly, and that appropriate action is taken. We uphold the right of all individuals to be heard without fear of retaliation.

Whilst the length of time required to fully investigate complex reports can vary, Padma aims to handle whistleblowing reports in a timely manner, with indicative timelines provided later in this policy.

1. Policy and Procedures

**5.1 What to Report**

This policy encourages the reporting of any genuine concerns about potential wrongdoing, illegal or unethical conduct, or breaches of PADMA's policies and procedures. Examples of concerns that should be reported include (but are not limited to):

* Financial irregularities, fraud, or corruption.
* Bribery or unethical business practices.
* Breaches of legal or regulatory obligations.
* Endangerment of health, safety, or the environment.
* Discrimination, harassment, or bullying.
* Misconduct or unethical behaviour.
* Concealment of any of the above.

In case of compliance failures that may constitute a breach of applicable laws or regulations, PADMA may be legally obligated to inform relevant external bodies. PADMA will comply with all legal obligations regarding such external reporting in each relevant jurisdiction.

5.2 How to Raise a Concern

5.2.1 PADMA is committed to providing multiple channels for individuals to raise concerns. Individuals are encouraged to report concerns to their line manager in the first instance, where appropriate [See also: Employee Suggestion and Grievance Policy]

However, if an individual feels unable to raise the concern with their line manager, or if the concern involves their line manager, they can report it through one of the following channels:

Designated Whistleblowing Contacts:

* **Local HR Representative**: Individuals may raise concerns with their local HR representative, who will be responsible for escalating the matter appropriately in accordance with this policy and local procedures.
* **Any PADMA Country Manager**: Individuals can contact another PADMA Country Manager if they do not wish to raise a concern in their own location.
* **Global Head of ESG** esg@padmatextiles.com
* A designated **employee representative**

5.2.2 When raising a concern, individuals should provide as much detail as possible, including:

* \* The nature of the concern.
* \* The date(s) and location(s) of the incident(s).
* \* The name(s) of the individual(s) involved.
* \* Any supporting documentation or evidence.

5.2.3 While individuals are encouraged to provide their name when raising a concern, PADMA understands that some individuals may wish to remain anonymous. Reports can be made anonymously by contacting esg@padmatextiles.com anonymously, or addressing a written concern to:

Global Head of ESG Chief Financial Officer

Padma Textiles Ltd. Padma Textiles Ltd

Kazım Dirik Mah. Üniversite Cad. Flat 2, 40 Mistral Court

Meva Plaza No 116 Ofis 72 Swieqi

35100 – Bornova İzmir Malta SWQ 3081

Türkiye

Please note that providing contact information may enable the investigation process to be more effective and allow for follow-up questions to clarify the concern.

6. Investigation of Concerns

6.1. All concerns raised under this policy will be taken seriously and investigated appropriately and in a timely manner. The investigation process will be conducted fairly, impartially, and with due regard to confidentiality, where appropriate and practicable.

**The Investigation timeline**

This may vary depending on the severity and complexity of the concern raised. The following is an indicative timeline:

**6.1.1 Initial Acknowledgment:**

* **Timeline:** Within **2**-3 working days of receiving the report.
* **PADMA’s Action:** Acknowledging receipt of the concern to the whistleblower (if their identity is known), confirming that it is being taken seriously and outlining the next steps.

**6.1.2. Initial Assessment and Information Gathering:**

* **Timeline:** Within **5-7 working days** of receiving the report.
* **PADMA’S Action:** Conducting a preliminary assessment to understand the nature and seriousness of the concern. Gathering any readily available initial information. Determining if the concern falls under the scope of the Whistleblowing Policy or if it should be handled under a different policy (e.g., Suggestion and Grievance Policy). Assigning the appropriate person or team to handle the investigation.

**6.1.3. Formal Investigation:**

* **Timeline:** This will vary significantly depending on the complexity of the allegations. For more serious and complex matters, it could take **several weeks or even months**.
* **PADMA’s Action:** Conducting a thorough and impartial investigation. This may involve interviewing relevant individuals, reviewing documents, and gathering evidence. Keeping the whistleblower (if known) informed of the progress of the investigation at reasonable intervals, respecting confidentiality.

**6.1.4 . Outcome and Feedback:**

* **Timeline:** As soon as reasonably practicable after the investigation is complete, and typically within a defined timeframe (e.g., **within 10-15 working days** of the investigation's conclusion).
* **PADMA’s Action:** Communicating the outcome of the investigation to the whistleblower (if known), outlining any findings and actions taken (while respecting confidentiality of others involved).
* Where investigations reveal serious compliance failures that may have legal or regulatory implications, PADMA will take appropriate action, which may include informing relevant external authorities as required or permitted by applicable local laws.

6.2. The designated individuals or teams responsible for investigations will be competent and independent. The investigation process may vary depending on the nature and seriousness of the concern and will be conducted in accordance with any relevant local laws and procedures.

6.3. Feedback on the outcome of the investigation will be provided to the individual who raised the concern, where appropriate and permitted by law, while respecting the confidentiality of those involved.

7. Protection Against Retaliation

7.1. Padma is committed to ensuring that no individual suffers any detriment or retaliation as a result of raising a genuine concern in good faith under this policy. Any form of retaliation will be treated as a serious disciplinary matter.

7.2. This protection applies even if the concern is not ultimately substantiated, provided it was raised honestly and with a reasonable belief that wrongdoing had occurred.

8**.** Implementation and Responsibilities

8. 1 This global policy provides the overarching framework for whistleblowing within PADMA. Country Managers in the UK, Europe and Bangladesh are responsible for ensuring that this policy is effectively communicated and implemented within their respective regions, taking into account local legal requirements and cultural contexts.

Where necessary, local procedures may be developed to supplement this global policy, provided they are consistent with its core principles and comply with local laws.

**AMDAP ESG Leadership Group** is responsible for overall communication, implementation and management of this policy.

**PADMA ESG Committee** is responsible for reviewing the effectiveness of this policy annually.

**PADMA Country Managers** are responsible for communicating, implementing and promoting this policy in their own location in a way that is compliant with local laws, cooperating fully with the investigation of grievances and ensuring that the company’s policy of non-retaliation is strictly upheld.

**The Global Head of ESG is** oversees this policy on behalf of AMDAP Leadership Group and is responsible for ensuring a record of grievances and their resolution is maintained in a central location to enable review, reporting and continuous improvement.

8.2 PADMA will communicate this policy to stakeholders and provide regular training to relevant personnel on this policy. Country Managers should ensure that a copy of this policy is displayed in the workplace in local languages.

9**.** Monitoring and Review

This policy will be reviewed periodically to ensure its effectiveness and relevance to Padma's global operations and any changes in applicable laws and regulations.

PADMA will maintain a central record of all whistleblowing reports and their outcomes, including the nature of the issue, resolution status, and time taken for resolution. This data will be analysed to identify trends, systemic issues, and areas for improvement.

The review process will be used to inform any necessary updates to this policy, to ensure it remains relevant and compliant with evolving global and local legal landscapes, to improve grievance handling processes, and to drive broader improvements in PADMA’s environmental, social, and governance performance.

10. Related Policies

Employee Suggestion and Grievance Policy

External Feedback and Grievance Policy

Code of Business Ethics

Environmental Policy

Human Rights Policy

12. Approval

**Approved by Padma Textiles ESG Leadership Group**

**16.07.2025**

**Approved by Marvic Fenech Adami, CFO, on behalf of AMDAP Ltd.**

**16.07.2025**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**