

Approved by the Board on 29 January 2025

WHISTLEBLOWING POLICY

Bloomsbury is committed to conducting business fairly, honestly and openly, and expects all employees and business partners to maintain the highest legal, professional and ethical standards wherever it operates around the world. However, all organisations face the risk of things going wrong from time to time, or unwittingly becoming associated with illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

This policy is addressed to Bloomsbury's employees and those working with us such as agency staff. The purpose of this Whistleblowing Policy ("Policy") is:

- To encourage you to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated as appropriate, and that confidentiality will be respected.
- To provide you with guidance as to how to raise those concerns.
- To reassure you that you should be able to raise genuine concerns without fear of reprisals, even if you turn out to be mistaken.

Our business partners such as suppliers may also use our external whistleblower provider Navex (details below) to report concerns.

What should I speak up about?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers in relation to Bloomsbury's activities. Although not an exhaustive list, this may include:

- Criminal activity, such as bribery, corruption, fraud, theft, tax evasion etc.
- Failure to comply with any legal obligation or regulatory requirement
- Matters of health and safety
- Damage to the environment
- Human rights or modern slavery breaches
- Negligence
- Breach of Bloomsbury's internal policies and procedures
- Conduct likely to damage Bloomsbury's reputation or financial wellbeing
- Unauthorised disclosure of confidential information
- Any victimisation, sexual harassment, discrimination or act of abuse towards any employee or those working with us
- The deliberate concealment of any of the above matters

If you have any genuine concerns related to suspected wrongdoing or danger in connection with any of Bloomsbury's activities you should report it under this Policy.

How do I raise a concern?

Option 1: Tell your line manager / head of department

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Compliance Team.

Option 2: Tell an alternative internal contact

If you feel unable to raise the matter with someone in your immediate line management, or if you feel that your line manager has not addressed your concern, please bring the issue to the attention of one of the following:

- **Maya Abu-Deeb, General Counsel and Company Secretary; or**
- **Karl Burnett, Group Director of People and Engagement**

Again, you can tell them about the problem in person or put it in writing if you prefer.

Option 3: External Whistleblowing provider

We would hope that you feel able to report your concerns to someone internally. However, if the nature of the matter is such that you cannot raise it with any of the contacts identified or, if you have followed the internal channels listed in Options 1 and 2 and you still have concerns, you can raise a concern via Navex. Bloomsbury has selected Navex as an external, independent supplier of a whistleblower helpline and portal. Navex can support workers and suppliers who wish to raise issues of concern that they feel unable to raise within Bloomsbury, in a safe and confidential manner. If you wish, you can be anonymous when doing so. We understand that disclosures made under this Policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. When this is the case, we will endeavour to investigate your concerns fully, although a full investigation may be impeded if we cannot obtain further information from you.

Online reporting can be made via either of these portals: www.Bloomsbury.ethicspoint.com and www.Bloomsburymobile.ethicspoint.com

Or by telephone

United Kingdom:	080 238 9843
United States of America:	833 761 5917
Australia:	1800 958 102
India:	000 800 050 2416

What will happen next?

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. Please note that you may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. How we communicate with you will be determined by how you have raised the concern. If you have raised a concern anonymously via the Navex portal, we will only be able to communicate with you via the portal, and you will only see such communications if you log

into the portal with the reference number which will have been provided to you at the time you raised the concern.

Disciplinary action

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this Policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager, or the HR Department or one of the two internal contacts listed above (the General Counsel or the Director of People and Engagement), immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure as set out in the Employee Handbook, or if appropriate, the Disciplinary Procedure.

Further information

If you have any questions about this Policy and how it applies to you, please contact compliance@bloomberg.com.