CONFIDENTIAL REPORTING POLICY

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1. POLICY OVERVIEW

1.1 Introduction

Doing things right is important to Cairn. It helps ensure we achieve our goals, protect our brand, and meet the expectations of our home buyers, shareholders, and employees.

Where things do go wrong, we need to know about it so we can review and address the problem. This helps us learn from our mistakes so we can always improve and do things better next time.

We want everyone to feel confident they can raise issues and concerns to ensure things don't go wrong or that they are put right as soon as possible.

1.2 Scope

This policy applies to all Cairn directors, officers, employees, suppliers and contractors.

1.3 Objectives

This policy tells you how to report genuine issues or concerns you may have in in connection with Cairn' business, including:

- breaches of regulations, the law, or our polies and procedures;
- misconduct;
- discrimination or sexual harassment;
- financial malpractice or fraud;
- health and safety or environmental issues.

1.4 About this policy

- This policy applies to all the business activities of Cairn.
- This policy does not form part of any employee's contract of employment, and we may amend it at any time.
- Cairn's Board of Directors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2. RAISING A CONCERN

2.1 Key principles

Cairn encourages employees, suppliers, and contractors to report genuine issues and concerns as soon as they arise. Once raised, they will always be taken seriously and investigated. Where appropriate your confidentiality will be respected.

Genuine concerns and issues can always be reported without fear of reprisals, even if the report turns out to be mistaken.

2.2 Examples of issues or concerns

We don't know what could go wrong but we have detailed below some examples of things that can be reported under this policy. Even if something isn't listed, it doesn't mean you cannot or should not report it.

- employee harassment, discrimination, or ill-treatment;
- creating, ignoring, or concealing safety or environmental hazards;
- breaches of our policies, procedures, or Code of Conduct;
- theft, fraud, bribery, or any form of corruption or illegal activity; or
- accounting or financial irregularities.

2.3 Employment grievances

This policy is not intended to deal with employment or workplace related grievances. If you have a grievance, please refer to the relevant policies and speak with your line manager or the HR team.

2.4 Safeguards

Cairn will not take any action or reprisal against anyone raising a genuine concern, even if it turns out to be mistaken. You should not suffer any detrimental treatment as a result of raising a concern, including dismissal, disciplinary action, demotion, loss of privileges, or threats. If you do, you should immediately raise the matter with anyone on the Confidential Reporting Team directly or use the Grievance Procedure. Any form of retaliation or threatening behaviour against anyone who raises a genuine concern will result in disciplinary action.

2.5 Raising a concern

There are a number of ways in which you can raise genuine concerns. How you raise it will depend on the issue and the circumstances, but we want you to raise it in the way which makes you most comfortable.

- Tell your line manager: Your line manager will usually be the person best able to resolve the issue or escalate it so, if possible, tell them first. Tell them in person, or in writing if you prefer.
- Tell one of the Confidential Reporting Team: If you do not want to tell your line manager, you can contact any member of the Confidential Reporting Team. Their details are listed on MyCairn.
- Make a report using Cairn's confidential reporting system: You can also submit a report using our confidential reporting system: https://cairn.integrityline.com. You will be asked to provide details of the concern you wish to raise, but you can choose to remain anonymous. When making a report on the system you will also be asked to create a mailbox on the system so we can communicate with you confidentially.

We have provided these mechanisms for reporting so it should not be necessary for you to raise your concerns externally. Always seek advice before reporting a concern externally. If you believe there is no alternative but to report your concern externally, you should contact a prescribed person, a prescribed external person, or the Office of the Protected Disclosures Commissioner.

If the concern is not about Cairn but instead relates to a contractor, supplier or some other third party, then we ask you to raise the concern internally first and seek guidance from us.

2.6 Concerns raised in bad-faith

We positively encourage reporting of genuine issues or concerns. However, we will not tolerate concerns raised in bad-faith or maliciously. Concerns that are deliberately false or made with malicious intent may lead to disciplinary action against the person raising the false or malicious concern, up to and including dismissal.

3. DEALING WITH A CONCERN

Once an issue or a concern is raised, Cairn will deal with it in accordance with this Policy.

3.1 Confidentiality

If you wish to raise your concern confidentially, we will make every effort to keep your identity secret. Where an investigation requires your identity to be revealed to others, we will always discuss this with you first. Raising a concern anonymously makes it difficult, and sometimes impossible, for us to investigate it and then deal with it. If you are concerned about the possibility

of reprisal, first raise your concern with anyone on the Confidential Reporting Team or use our confidential reporting system https://cairn.integrityline.com.

3.2 Acknowledging your concern

Once a concern is raised under this Policy we will acknowledge the report as soon as possible.

3.3 Obtaining further details

We will ask you to provide the details relating to your concern. We may want to do this in a meeting. If so, you can bring a colleague or a union representative. We will write the details down and let you have a copy.

3.4 Investigation

We will review the concern and decide whether and how to investigate the concern further. Any investigation will be concluded promptly and, as far as reasonably practicable, in a way that respects the principles set out in in this Policy. This includes making every effort to keep your identity as the employee raising the concern secret. If your identity needs to be revealed to investigate or pursue the complaint, this will be discussed with you first and your consent sought. If your consent is not given, it may not be possible to investigate further and deal with the concern.

3.5 Keeping you informed

To the extent it is appropriate, and we are permitted to do so, we will keep you informed of how your concern is being addressed, the progress of the investigation and its outcome.

END OF POLICY