



Group Policies

Whistleblowing Policy

(Making a disclosure in the public interest)

Introduction

We are committed to the highest standards of openness, honesty, and accountability.

An important aspect of this accountability and transparency is a mechanism to enable our employees to voice concerns in a responsible and effective manner.

It is a fundamental term of our contracts of employment that an employee faithfully serves their employer and does not disclose confidential information about their employer's affairs.

Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation, this information should be disclosed internally without fear of reprisal.

However, it should be stressed that this policy is intended to assist individuals who believe that they have discovered malpractice or impropriety. It is not designed to question legitimate financial, or business decisions taken by the Company, nor should it be used to reconsider any matters which have already been addressed through other procedures.

Definition

Whistleblowing is when an employee knows, or suspects, that there is some wrongdoing occurring within their organisation and alerts their employer or the relevant authority accordingly.

Employees who whistle blow are protected by the Public Interest Disclosure Act 1998. To be covered by whistleblowing law, an employee who reports a potential whistleblowing situation must believe that they are acting in the public interest.

Actions to be taken by the employee

If an employee knows, or suspects, that some wrongdoing is occurring within the organisation, he or she should, in the first instance talk to his or her line manager or raise the matter with the HR department or the Group Company Secretary.

Possible situations

Although this list is not exhaustive, examples of situations in which it might be appropriate for an employee to report a wrongdoing include the following protected disclosures covered by whistleblowing law:

- Conduct constituting a potential criminal offence (for example financial impropriety such as fraud; acts of bribery or corruption).



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- Improper conduct or unethical behaviour or behaviour which is contrary to the Group's stated Ethical Principles.
- The failure to comply with an obligation set in law.
- Improper conduct or unethical behaviour, harassment of a customer or supplier.
- Damage to the environment.
- An act or omission which endangers or might endanger someone's health and safety
- Trying to cover up wrongdoing in any of these situations

Personal grievances for example, bullying, harassment and discrimination are not covered by whistleblowing law, unless the particular incident is a matter of public interest. These situations should be reported to Human Resources, who will provide advice on the utilisation of the Group grievance policy.

Action to be taken by the manager/HR/Company Secretary (Recipient)

Any recipient who is informed by an employee of potential wrongdoing must take immediate action to investigate the situation. In doing so, the Recipient must take every possible step to maintain the anonymity of the employee who has made the allegation of wrongdoing should they so wish. All reports of potential wrongdoing must, upon the receipt of the report, be reported to the Group Company Secretary by the Recipient without identifying the employee should the employee so wish.

The employee who has raised the issue of a wrongdoing will be kept informed of any investigation that is taking place. The employee will also be informed of the outcome of the investigation. It might not always be appropriate to tell the employee the detail of every action that is taken, but the employee will be informed if action is taken.

Alerting outside bodies to a potential wrongdoing

An employee should always, in the first instance, talk to his or her line manager or the HR department about a potential wrongdoing.

If the employee is not satisfied with the response or action taken, he or she is then entitled to contact a relevant external body to express their concerns. In doing this the employee should:

- Have a reasonable belief that the allegation is based on correct facts.
- Not be making any personal gain from the revelations.
- Make the disclosure to a relevant body.

A "relevant body" is likely to be a regulatory body (e.g., the Health and Safety Executive, Environmental Agency, Police or the Financial Services Authority).

Anonymous Whistleblowing Hotline

The Company offers an anonymous whistleblowing hotline through Wellbeing Solutions at 0800 1601787 to report whistleblowing situations,.

Contacting the media





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The media is not a relevant external body and therefore employees should not contact the media with allegations about the organisation.

Protection against detriment

Any employee who acts under the Public Disclosure Act 1998 will be protected from any detriment in relation to any allegations that are made.

If the employee does not follow the procedure set out, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply. But disclosing information in an inappropriate way (e.g., contacting the media) could result in disciplinary action being taken against the employee, which could include dismissal.

Mark Smith
Chief Executive Officer

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