

WHISTLEBLOWING POLICY

First introduced March 2017

WHISTLEBLOWING POLICY (Raising a Concern) – Policy Number 09PEO-1PY-24

1 Background

Whistleblowing occurs when an employee raises a genuine concern about potentially dangerous, illegal or unethical activity that they are aware of or may suspect at work. Raising a concern can save lives, money and reputation of Sir Robert McAlpine.

We have a positive commitment and open approach to whistleblowing, in line with our values of being honourable and acting responsibly. Our policy is in line with the Public Interest Disclosure Act 1998 but is intended to encourage individuals to raise any matters of genuine concern that are in the public interest without fear of reprisal, so that they may be investigated and, where appropriate, acted upon.

It can be difficult, at times, to know what to do. You may be worried about raising such issues or may want to keep concerns to yourself, perhaps feeling it is not any of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to your colleagues, to your managers or to the company. Therefore, we have introduced this policy as a way to enable employees to raise genuine concerns about such matters at an early stage and in the right way. We would rather you raised the matter when you feel that it is a real concern, rather than waiting to have all relevant information.

2 Who does this policy apply to?

This policy applies to all employees including but not limited to all staff and operatives directly employed by Sir Robert McAlpine Limited, regardless of age, sex, religion or faith, pregnancy or maternity, gender identity, race, sexual orientation, marriage or civil partnership, socioeconomic background and any other relevant characteristics.

Our policy should not be used for matters that in the first instance should be referred to an individuals' line manager or complaints relating to an employee's own personal circumstances such as the way they have been treated at work which are covered by the appropriate supporting policies, for example, the Grievance Policy.

3 Procedure

What is covered by our policy?

Disclosing a genuine concern, which, in your honest, reasonable belief, is in the business or public interest and suggests that wrongdoing has been committed, is being committed or is likely to be committed. Examples of a Whistleblowing concern include but are not limited to:

- Threats to an individual's health or safety
- Poor practice or negligence
- Fraudulent activity
- A criminal offence
- A miscarriage of justice

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- Non-compliance of fair recruitment practice
- A deliberate attempt to cover up any of the above.

You can report one or more whistleblowing concerns.

Whistleblowing Helpline

One of your options for speaking up is through calling the Whistleblowing Service, our independent whistleblowing helpline. It is a confidential way to get answers to your questions and to raise concerns. It is administered by Health Assured and is available every day of the week at any time, day or night. Their number is **0800 047 4037**.

How do I go about raising a concern?

It is expected that, in many cases, individuals will raise their concerns first with their line manager. This can be done either face to face or in writing. If this is not possible, you can speak to another manager in your team or one of the supporting functions for example Human Resources, Legal or Health and Safety. You can also speak directly to the Whistleblowing Officer or the Whistleblowing Helpline.

When raising your concerns, please do it in writing where possible, setting out the background and history of your concerns (giving names, dates and places where possible) and indicating the reasons for your concerns and that you are raising your concern as part of our Whistleblowing Policy. The matter will then be referred to the Whistleblowing Officer.

What if I don't want to reveal my identity?

The Whistleblowing Helpline will allow you to raise any concern that you have on an anonymous basis for subsequent investigation by the company. It should be noted that if you make a disclosure anonymously, it will make it more difficult to investigate and address your concerns.

Confidentiality

In raising a concern (unless you have specifically requested anonymity), you may assume that only those company employees involved in investigating it will know your identity. We will not reveal your identity outside of this group unless:

- Where we are legally obliged to do so;
- On a strictly confidential basis to a professional qualified lawyer or accountant when getting advice;
- Where that information is already in the public domain.

What happens during an investigation?

The Whistleblowing Officer will consider the appropriate approach to the investigation of your concerns on a case by case basis. You can bring a colleague of your choice as a companion to any meetings you attend during the investigation. You will be able to confer with your companion during the meeting and they may be able to address the meeting but

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are unable to answer any questions on your behalf. Companions must respect the confidentiality of the disclosure and any subsequent investigation.

What sort of response can I expect from the company?

First and foremost, if you have a reasonable belief that wrongdoing is taking, has taken, or is likely to take place, you will be treated fairly and justly by the company and we will take the matter seriously.

We will take all reasonable steps to ensure that no person under our control victimises or retaliates against you or subjects you to any detriment as a result of you raising a genuine concern under this policy.

What happens if I am implicated?

If you blow the whistle and actively cooperate with an investigation in which you may be implicated in any wrongdoing, you are likely to receive a lighter sanction than might otherwise have been the case depending on the seriousness of the issue.

What happens after the investigation?

The Whistleblowing Officer will ensure to the appropriate extent that the findings of the investigation are acted upon. If you have not remained anonymous in raising your concerns, then the findings and actions arising from the investigation will be communicated to you.

If you are not happy with the way in which your concern has been handled, you can raise the matter further with the People Director.

Roles and Responsibilities

Employees and others working at the company should be aware of this policy and when making any disclosure, to tell their line managers or the Whistleblowing Officer if they have a direct personal interest in the matter.

Managers must make individuals aware of this policy in order to encourage a positive open working culture for all individuals working at the company where they can express their concerns easily and know that these are taken seriously. Employees may ask the Manager to raise their concerns with the Whistleblowing Officer on their behalf and Managers should ensure this act on this request quickly and effectively.

Victimisation

It is unacceptable to subject an individual to any victimisation because they have made a disclosure under this policy. All such complaints will be treated seriously, if upheld will provide grounds for disciplinary action. If any person who has made a disclosure believes they have suffered detriment or been victimised, they should inform the Whistleblowing Officer immediately and provide details.

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External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. We encourage you to seek advice from the Whistleblowing Officer or the Human Resources Department before reporting a concern to anyone external.

Contractual status of this policy

This policy does not form part of your contract of employment. The company has the right to amend this policy at any time. It will communicate any material changes to employees.

Ownership, updates and queries

The policy is owned by the People Director and will be reviewed periodically. The Whistleblowing Officer is the Head of Legal Department. The Whistleblowing Helpline number is **0800 047 4037**.

Any questions on the application of the policy should be directed to the Human Resources Department, the Whistleblowing Officer or the Whistleblowing Helpline.



Michael Divers
 People Director

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