

# WHISTLEBLOWING POLICY

#### **Purpose**

This policy establishes procedures for employees to report concerns about illegal or unethical activities within the organisation. It is intended to provide a safe and confidential environment for employees to raise issues without fear of retaliation.

### Scope

This policy applies to all employees of Brenmar Ltd

#### **Definition of Whistleblowing**

Whistleblowing is the disclosure of information by an employee to a responsible person within the organisation or to an external authority about a wrongdoing or suspected wrongdoing that is related to the organisation's business.

#### **Types of Concerns**

Employees may report concerns about:

- Illegal activities
- Unethical behaviour
- Violations of company policies
- Fraud
- Waste
- · Abuse of power
- Discrimination
- Harassment

## **Channels for Reporting**

Employees may report concerns through the following channels:

- 1. **Direct Manager:** If the employee feels comfortable, they may report the concern to their direct Site or Project Manager.
- 2. **Operations & Compliance Manager:** The operations & Compliance Manager is designated as the primary point of contact for whistleblowing reports.
- 3. **External Authority:** In certain circumstances, employees may report concerns to an external authority, such as law enforcement or a regulatory agency.

# Confidentiality

The organisation will take reasonable steps to protect the confidentiality of whistleblowers. However, in some cases, it may be necessary to disclose the identity of a whistleblower to investigate or resolve a concern.

#### **Protection Against Retaliation**

The organisation prohibits any form of retaliation against employees who report concerns in good faith. Retaliation includes, but is not limited to, demotion, termination, or other adverse employment actions.



# Investigation

All reports of concerns will be investigated promptly and thoroughly. The investigation will be conducted by a person who is independent of the matter being investigated.

### **Reporting False or Frivolous Claims**

Employees who make false or frivolous reports may be subject to disciplinary action.

# **Training**

The organisation will provide training to employees on this policy and on the importance of reporting concerns.

### **Review and Updates**

This policy will be reviewed and updated periodically to ensure its effectiveness.

### **Contact Information**

For any questions or concerns regarding this policy, please contact Louise Hinckley on 01489 891196.

Signed

Mark Harvey Director

September 2024