
Whistle Blowing Policy

POL 041

1. Introduction

This policy applies to John Graham Holdings Limited and shall apply mutatis mutandis to each of its subsidiary companies, as defined under S.1159 of the Companies Act 2006, and whether existing at the date of this policy or thereafter incorporated (hereinafter referred to as “GRAHAM”).

GRAHAM seeks to ensure the proper conduct of its business and is committed to effective governance, the highest possible standards of openness, honesty and accountability to embed an anti-fraud culture.

This policy supports that commitment by encouraging employees and others who may have serious concerns about any aspect of the GRAHAM's work to be able to raise those concerns in good faith, in confidence and without fear of recrimination.

'Whistleblowing' may be defined as the action of an individual disclosing evidence of wrongdoing including fraud, financial irregularity, serious maladministration arising from the deliberate commission of improper conduct, unethical activities which may be of a criminal nature and dangerous acts or omissions which create a risk to health, safety or the environment, within an organisation.

GRAHAM is committed to dealing responsibly and professionally with any genuine concern raised about malpractice, be it danger to staff or the public, financial malpractice, breach of legal obligations or damage to the environment. The making of deliberately false or malicious allegations by any employee will be regarded as a serious disciplinary offence.

GRAHAM acknowledges the legal protection, under the Public Interest Disclosure Act 1998, provided for workers who make disclosures about improper practice.

GRAHAM are committed to being an inclusive workplace where all employees, customers and stakeholders can fully participate and contribute. We strive to ensure accessibility across all facets of our operations, including physical spaces, digital platforms, communication channels and services.

Our People policies are regularly audited against rigorous accessibility standards to ensure compliance and to support every employee.

Anyone who requires additional support or has any questions regarding accessibility can contact the HR team at HR-JGC@graham.co.uk (hyperlink) or HR-GFM@graham.co.uk (hyperlink) or call us on 028 92 689500 and request to be transferred to the relevant HR Team.

2. Aim of the Policy

The aim of the Policy is to encourage anyone who may have concerns about improper conduct of GRAHAM or its employees to disclose any allegation of

malpractice, without fear of recrimination. The Policy is founded on the principle that service users and the public interest come first.

This policy covers disclosures made by both employees and Third Parties. Third Parties are defined as individuals who are not GRAHAM employees e.g. visitors or sub-contractors.

3. Concerns Involving Fraud & Corruption

Concerns can be raised if there is a reasonable belief that one or more of the following has occurred:

- Gross mismanagement.
- Actions that are illegal, fraudulent and/or corrupt, including the making and/or accepting of bribes.
- Actions that compromise health and safety at work.
- The concealment of any of the previous matters.
- Similar behaviour not otherwise described.

Safeguards

4.1 Harassment or Victimisation

GRAHAM recognises that the decision to report a concern can be a difficult one, not least because of the fear of reprisal from those responsible for the misconduct. GRAHAM will not tolerate harassment or victimisation and will take all reasonable measures to protect those who raise a concern in good faith. This does not mean that, if you are the employee making the disclosure and are already the subject of disciplinary or redundancy procedures, these will be halted as a result of the disclosure.

4.2 Confidentiality

GRAHAM will protect the identity of the person making the disclosure (wherever possible) where the employee has requested that his or her name be kept confidential. During the course of an investigation, GRAHAM will keep a minimum number of people aware of who raised the matter. However, it must be appreciated that the investigation process may reveal the name of the source of the information, and a statement by the employee making the disclosure may be needed as part of the evidence.

4.3 Anonymous Allegations

This policy encourages those making a disclosure to put their name to the allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of Senior Management. In exercising that discretion, the factors to be taken into account would include:

- i) The seriousness of the issue raised;
- ii) The credibility of the concern; and
- iii) The likelihood of confirming the allegation from attributable sources.

4.4 Untrue Allegations

If an allegation is made in good faith but it is not confirmed by the investigation, no action will be taken against the employee making the disclosure. If, however, individuals make malicious or vexatious allegations, the allegations will not be taken further and disciplinary action may result. The judgement of whether an allegation is malicious or vexatious rests with the Executive Chairman, after consultation with other senior managers as necessary.

4. Procedure for Dealing with a Report

5.1 How to Report Any Concerns

You are advised in the first instance to report your suspicions to the Group Governance, Risk & Assurance Manager who manages all GRAHAM Whistle-blowing arrangements, dealing with concerns that relate to members of staff, and other contractors/partners. Employees can contact the Group Governance, Risk & Assurance Manager by telephone or letter.

Alternatively, your suspicions can be reported directly to the Chief Financial Officer.

The Group Governance, Risk & Assurance Manager may where necessary suggest that the matter be referred to third parties such as the police.

Everyone is advised that they may, in confidence and without fear of recrimination, disclose concerns of suspected improper conduct at the levels set out below. Concerns are better raised in writing. You are advised to set out the background and history of the concern, giving names, dates and places where possible, and the reason why the situation has raised particular concern. If you feel unable to put a concern in writing, you can telephone or meet the appropriate manager. It may be necessary for the originator to be called as a witness at a later date.

If you do not wish to go through this reporting mechanism, or you are unhappy with the outcome of any investigation undertaken, please feel free to contact any of the other external organisations listed in this policy at 6.2.

5.2 How The Complaint Will Be Dealt With:

5.2.1 The Group Governance, Risk & Assurance Manager will log all reports and carry out a preliminary review in each case to determine the most appropriate course of action. The action will depend on the nature of the concern and will also be logged. Any matters which fall within the scope of other existing procedures (e.g. harassment or discrimination issues) will be dealt with under those procedures. Some concerns may be resolved by agreed action without the need for investigation. Matters to be investigated may be: -

- Dealt with internally by Human Resources Department or
- Referred to the Police or other external agency.

5.2.2 Within **three working days** of a concern being received, GRAHAM will write to the complainant:

- Acknowledging that the concern has been received;
- Indicating how it proposes to deal with the matter,

GRAHAM may also ask for more information where this would assist in the investigation.

- 5.2.3** Investigations may result in recommendations for changes to procedures and systems which will be incorporated into action plans. Follow up reviews will be carried out to ensure that recommendations are implemented.
- 5.2.4** Investigations may lead to disciplinary action against employees conducted in accordance with GRAHAM Disciplinary Procedure. This may be in addition to any legal proceedings instigated by the police.
- 5.2.5** Where appropriate the Group Governance, Risk & Assurance Manager will refer findings to the Police for investigation or review, after discussion with the Group Chief Financial Officer.
- 5.2.6** If you raise a matter and then later decide to withdraw your concern, GRAHAM will respect your wishes wherever possible. However, if the matter is assessed as serious, then GRAHAM will, where it is deemed appropriate, continue to investigate which may result in further evidence being required from you.

6 Contact Details

6.1 If an employee wishes to raise a concern, they can contact either: -

Group Governance, Risk & Assurance Manager – Helen Donaldson

Telephone: 028 9268 1963

Helen.Donaldson@graham.co.uk (hyperlink)

Group Chief Financial Officer – Courtney McCormick

Telephone: 028 9268 1923

Courtney.Mccormick@graham.co.uk (hyperlink)

6.2 Other contacts

- Police
- Citizen's Advice
- Inland Revenue
- Environmental Agency
- Health and Safety Executive
- Information Commissioner
- Inspire 0800 3895362

Further information is available at www.opsi.gov.uk