

Schedule 12

Whistleblowing policy



IF YOU SEE SOMETHING, SAY SOMETHING
Report a whistleblowing concern: speakup@mjgleeson.com or call 0800 988 6818

1 About this policy

- 1.1 Many of us, at one time or another may have had a concern about what is happening at work. Usually these concerns are easily resolved, however, when a concern feels serious because it is about a possible fraud, danger or malpractice that might affect others or the organisation itself, it can be difficult to know what to do.

The Board and Chief Executive of MJ Gleeson take malpractice very seriously and are committed to running the organisation with integrity and honesty. We have revised this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way.

This policy covers all employees, officers, consultants, contractors, volunteers, apprentices, casual and agency workers. It does not form part of any employee's contract of employment and we may amend it at any time.

1.2 The aims of this policy are:

- 1.2.1 To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- 1.2.2 To provide staff with guidance as to how to raise those concerns.
- 1.2.3 To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

- 1.3 This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, staff, shareholders or the organisation itself. This policy does not apply to complaints you wish to make about your employment or how you have been treated, for which the grievance policy or bullying / harassment policy shall apply.

IF IN DOUBT - RAISE IT!

2 Responsibility for this policy

- 2.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to or concerns raised under this policy. If you have any concerns or questions about this policy, or whether a concern falls within the scope of this policy, then please raise these with the CEO or Group Head of Legal and Company Secretary.

OUR ASSURANCES TO YOU

3 Your safety

- 3.1 The Board understands that a culture of openness and accountability is essential to prevent malpractice or danger in the workplace. If you are raising a genuine concern then it does not matter to us if you are mistaken, we want and need to hear about it. We commit to ensuring that you will not suffer any detrimental treatment as a result of raising a genuine concern, but of course we cannot extend this assurance to someone who maliciously raises a matter they know is untrue.
- 3.2 We take a zero-tolerance approach to the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

4 Your Confidence

- 4.1 With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If this is the case, please make us aware at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.
- 4.2 Please remember that if you do not provide your details (and you are therefore raising a concern anonymously) it is much more difficult for us to investigate the matter, to establish whether the allegations are credible, or to inform you of the outcome. We therefore encourage the disclosure of your identity when raising any concerns.
- 4.3 However, if you are unsure about raising a concern you can get independent advice from **SeeHearSpeakUp**, our dedicated external Whistleblowing helpline provider (see contact details under Independent Advice).

4.4 How to raise a concern

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

4.4.1 Step one

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager. This may be done verbally or in writing.

4.4.2 Step two

If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with a senior manager based at our Head Office in Sheffield, or a member of our HR department.

4.4.3 Step three

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, then you can send an email to Gleeson's dedicated Whistleblowing reporting mailbox: Speakup@mjgleeson.com which will notify the Group Head of Legal and Company Secretary, or contact Leanne Johnson directly.

4.4.4 Step four

If your concern involves a member of the Executive Board or the Head of Legal and Company Secretary, then you can raise this with Fiona Goldsmith, Gleeson's Workforce Representative on the Board of Directors, on: fionagoldsmith@hotmail.co.uk

Please note that anyone who receives a report of Whistleblowing should notify the Head of Legal and Company Secretary (in full confidence if so required), so that the concern may be recorded on Gleeson's register.

5 How we will handle the matter

- 5.1 We will acknowledge receipt of your concern within five working days. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry, or a more formal investigation. If you are asked to attend a meeting, you may bring a colleague or Union representative with you, provide that person respects the confidentiality of your disclosure and subsequent investigation.
- 5.2 We will always inform you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will provide you with a written summary of the concern you have raised, how we propose to handle it, and provide a timetable for feedback. If we have misunderstood the concern or there is any information missing please let us know.
- 5.3 When you raise a concern it is helpful for you to provide your own opinion on how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you inform at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will let you know.
- 5.4 Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we have taken where this would infringe a duty of confidence we owe to another person. While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. If you are not happy with the way in which a concern has been handled, you can raise this with the CEO, CFO and/or Head of Legal and Company Secretary as set out above.
- 5.5 If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern please contact the HR Department.

6 Independent Advice

- 6.1 If you are unsure whether to use this policy or if you want confidential advice at any stage, or to report a matter with full anonymity you may contact the independent Whistleblowing helpline provider: **SeeHearSpeakUp** on the following details:

Email: report@seehearspeakup.co.uk

Tel: 0800 988 6818

Their dedicated helpline staff can talk you through your options and help you raise a concern about malpractice at work.

7 External Contacts

- 7.1 While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where it would be appropriate to report a concern to an external body. In fact, we would rather you raised a matter with the appropriate regulator – such as the Financial Conduct Authority or the Health and Safety Executive - than not at all.

8 Monitoring / Oversight

- 8.1 The Head of Legal and Company Secretary is responsible for this policy and will review it on a regular basis.