



## **Whistle Blowing Policy**

Elite Precast Concrete Ltd has a clear whistle Blowing Policy. We fully support our employees to make decisions in line with our whistle blowing policy.

Our corporate conduct is based on our commitment to acting professionally; fairly and with integrity and does not tolerate any form of bribery or corruption.

This policy applies to Elite Precast Concrete employees (staff, contract and temporary) and extends to all our business dealings and transactions in all countries in which we operate. We will encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

Employees should have the confidence to raise a suspected wrongdoing and should know that it will be taken seriously and investigated as appropriate. Employees raising genuine concerns should be able to do so without fear of reprisals, even if the Employee turns out to be mistaken.

Any questions in relation to the policy should be referred to Louise Chouhan-Hodges in the first instance.

### **Scope of policy**

This policy explains the law on whistleblowing and provides team members with guidance as to how to raise any malpractice or wrongdoing concerns.

This policy applies to all individuals for Elite Precast Concrete in the UK at all levels, including part-time and full-time employees, casual workers, agency workers and interns.

This policy should not be used for complaints relating to staff members' own personal circumstances for example, complaints about the way they have been treated at work.

This policy does not form part of any contract of employment and the Employer may amend it at any time at its absolute discretion.

## What can be reported under this Whistleblowing Policy?

Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the 'Act'). To constitute whistleblowing, a disclosure must be a 'Qualifying Discloser' under the Act (i.e. the employee must reasonably believe that the disclosure is in the public interest and the discloser must communicate that the alleged wrongdoing is happening, has happened or will happen). Such disclosures may be disclosed about:

- Criminal activity is being, or likely to be, committed.
- Miscarriage of justice has occurred, is occurring or is likely to occur
- The health and safety of an individual, or individuals, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Failure to comply, or likely to comply with any legal obligation to which they are subject
- Bribery
- Financial fraud or mismanagement
- Breach of Elite Precast Concrete's internal policies and procedures, including Codes of Conduct.
- Unauthorised disclosure of confidential information; or concealment of any of the above

## Principles

All concerns raised will be treated fairly and properly, Elite Precast Concrete will not tolerate the harassment or victimisation of anyone raising a genuine concern, who will remain anonymous, unless otherwise agreed and will ensure that any individual raising a concern is made aware of who is handling the matter, how they can contact them and if there is any further assistance required.

Elite Precast Concrete will give as much feedback as possible, without any infringement on a duty of confidence.

## Grievance procedure

If any employee believes reasonably and in good faith that malpractice exists within the workplace, then they should report this immediately to their own line manager. However, if for any reason they are reluctant to do so, then they should report their concerns to either the:

- Richard Doody - Commercial Director
- Owen Batham - Sales and Marketing Director
- Paul Cartwright - Business Development Director
- Mark Whistance - Operations Director

Employee's identities will not be disclosed without prior consent. Where concerns are unable to be resolved without revealing the identity of the employee raising the concern (eg, if their evidence is required in court), we will enter into a dialogue with the employee concerned as to whether and how we can proceed.