

WHISTLEBLOWING POLICY

Overview

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the organisation is responsible for or has taken part in some form of wrongdoing.

This policy applies to Hunt Group Limited and all subsidiary and related companies, including Britcon (UK) Limited, Hunt Leisure Limited and Specialist Surfacing Limited. Disclosures may be raised by any relevant stakeholders, including employees, workers or supply chain members.

The Hunt Group strive to ensure that employees, or any other relevant stakeholders, are able to report any act, or failure to act, which they think amounts to a wrongdoing in the workplace without fear of victimisation or harassment. Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Qualifying Disclosures

Certain disclosures are prescribed by law as “qualifying disclosures.” A “qualifying disclosure” means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the organisation has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation.
- a miscarriage of justice
- endangering the health and safety of an individual(s)
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present, or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Organisation will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest.” We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the organisation’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e., it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

Making a Disclosure

You are encouraged to raise concerns as soon as possible. You do not need to provide proof, only a reasonable belief that wrongdoing has occurred or is likely to occur.

In the first instance you should report any concerns with one of the following:

- Your Line Manager
- A HR Representative
- The Group Compliance Director

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All disclosures will be treated confidentially and sensitively. Your identity will not be disclosed without your consent, unless required by law. Anonymous reports will be considered, although they may be harder to investigate fully.

It is recommended that disclosures are made via email. However, you may submit your concerns in any format quoting this policy. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

Investigation Process

Once a concern is raised:

- The individual receiving the disclosure is to immediately inform the Group Compliance Director
- It will be acknowledged in writing within 5 working days.
- An initial assessment will determine whether an investigation is warranted.
- If required, a formal investigation will be conducted by an impartial and suitably senior person.
- Outcomes will be communicated to the whistleblower where appropriate, respecting confidentiality obligations.

Escalation

If for any reason you do not receive a reply to your disclosure within 5 working days, please raise the matter immediately with the Group Compliance Director.

The affected company's directors will aim to deal with all issues raised in a fair and efficient manner. However, if you are not satisfied with the response or wish to take the issue further, in the first instance please contact the Hunt Group HR Manager or a Hunt Group Director.

Beyond that, further advice can be found on the government website, including a list of relevant UK bodies for reporting different types of issues:

- UK Government Whistleblowing Guidance: <https://www.gov.uk/whistleblowing>
- List of Prescribed Bodies: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>
- The charity Protect provides free confidential advice to workers who have concerns about wrongdoing in the workplace and can be contacted by telephone on 020 7404 6609.

Disclosures by External Parties

Any external parties wishing to make a disclosure under this policy should do so by submitting their disclosure by email to HR@huntgroup.co.uk.

Formal Action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

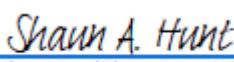
Protection Against Detrimental Treatment

The Hunt Group is committed to protecting whistleblowers from detriment, victimisation or dismissal. Retaliation against anyone who raises a concern under this policy will be treated as a disciplinary offence.

If you believe you have suffered any detriment, you should report it to HR or escalate it to the Group Compliance Director.

Record Keeping

All whistleblowing concerns, investigations, and outcomes will be logged and retained in line with data protection and confidentiality requirements. This policy will be reviewed annually or as required by legislative changes.


Signed: [Shaun A. Hunt \(Jul 11, 2025 13:16 GMT+1\)](#)

S Hunt, CEO