

WHISTLEBLOWING POLICY

Overview

Whistleblowing is the reporting of information concerning suspected wrongdoing, illegal activity, risk or malpractice occurring within an organisation or its supply chain.

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 strives 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 is a disclosure of information which an individual reasonably believes is in the public interest and tends to show that one or more of the following has occurred, is occurring, or is likely to occur:

- 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.

Disclosures may be made verbally or in writing. However, email is the preferred method of reporting as it provides a clear record of the concern and assists the investigation process. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

Individuals raising concerns in good faith will not be penalised where a concern proves to be unfounded. However, knowingly making a false, malicious or misleading allegation may result in disciplinary action.

Investigation Process

Once a concern is raised:

- The individual receiving the disclosure must notify the relevant company director and the Group Compliance Director as soon as reasonably practicable.
- 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 individual who is independent of the matters being investigated and has appropriate authority and competence..
- 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

Suppliers, subcontractors, customers, tenants, contractors and other external parties may raise concerns under this policy by submitting a disclosure to HR@huntgroup.co.uk. All concerns will be assessed and handled in accordance with this policy.

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.

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Record Keeping

All whistleblowing concerns, investigations, findings and outcomes will be recorded and retained in accordance with applicable data protection requirements and the Group Records Retention Schedule. Trends and significant issues may be reviewed periodically to assess the effectiveness of whistleblowing arrangements.. This policy will be reviewed annually or as required by legislative changes.

Responsibilities

The Board of Directors of each Hunt Group company has overall responsibility for ensuring that appropriate arrangements are in place to support whistleblowing and the investigation of concerns within its respective business.

Managers are responsible for creating an environment in which employees feel able to raise concerns and for ensuring disclosures are handled appropriately and escalated where necessary.

The Group Compliance Director will provide oversight, advice and support in relation to whistleblowing matters and maintain a central record of disclosures received across the Group.

Signed: *R. Reed*

Group Compliance Director