Whistleblowing policy statement

All employees are encouraged to raise genuine concerns about possible improprieties in matters of malpractice at the earliest opportunity, and in an appropriate way.

This policy is designed to:

- Support our values
- Ensure employees can raise concerns without fear of suffering retribution
- Provide a transparent and confidential process for dealing with concerns

What is Whistleblowing?

Whistleblowing is the term used when an employee reports information concerning wrongdoing. The Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who reasonably believe that they are acting in the public interest.

The types of concerns that may be raised include:

- Criminal offences, for example, fraud
- Failure to comply with an obligation set out in law
- Miscarriages of justice
- Endangering of someone's health and safety or a breach of regulations
- Damage to the environment
- Covering up wrongdoing in the above categories

The concern may be about something that occurred in the past, is happening now or may happen in the future.

You do not need to provide evidence of the concern, but you must hold a reasonable belief that the information is genuine. As long as you do, then you will be covered by the protection set out in this policy regardless of whether you are mistaken, or the matter cannot be proved.

Note: this policy is not Keltbray's normal grievance procedure. If you have a complaint about your own personal circumstances, then you should use the grievance procedure.

Protection of Whistleblowers

Keltbray Group are committed to this policy and treating all concerns consistently and fairly. If the policy is used to raise a concern in good faith, we give you assurance that you will not suffer any form of retribution, victimisation or detriment as a result of your actions. In addition, PIDA may provide you with legal protection in relation to your disclosures if you raise your concerns in accordance with that Act.

If you ask us to treat the matter in confidence, we will do our utmost to respect your request. However, it is not possible to guarantee confidentiality as there may be a requirement in law to disclose your identity. If we are in a position where we cannot maintain confidentiality and so have to make disclosures, we will discuss the matter with you first.

You can raise a claim anonymously however it will be much more difficult for us to look into the matter as we may require further information. There may be processes which can be used to retain your anonymity such as telephone appointments or use of an anonymised email address.

Support during incidents of whistleblowing

Keltbray recognises that whistleblowing incidents can be psychologically and emotionally stressful for all involved. It can have an impact on the whistleblower, those involved in the incident and the wider workforce.

Independent and confidential psychological support will be made available throughout the process to any individuals who may be impacted. Details of the support available will be provided following acknowledgement of the concern raised.

Raising a concern externally (exceptional)

In almost all cases you should not find it necessary to report any concerns externally.

The purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally without reporting the concern to external bodies. Raising concerns internally will be the most appropriate action and so you must try to do this.

If you feel unable to raise your concerns internally you may consider raising the matter with the appropriate regulator, for example, Health and Safety Executive, Environmental Health Department etc. If you do take this route to

whistleblow an issue, you may be required to demonstrate why you thought the normal internal procedure was not appropriate.

You are strongly encouraged to take advice before reporting a concern externally.

Procedure

Who to tell

In the first instance, you can report your concern to your Line Manager and/or email concerns@keltbray.com

You should make it clear that you are making your disclosure within the terms of the whistleblowing policy. This will ensure the recipient of the disclosure realises this and takes the necessary steps to investigate the disclosure and to protect the whistleblower's identity.

Response to whistleblowing

After you have raised your concern, and if you have provided your details, we will get in touch with you to discuss your concern. We will then decide how to proceed in a responsible and appropriate manner. Usually this will involve making internal enquiries first but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will aim, as far as possible, to keep you informed of the progress of the investigation, its likely timescale and the outcome of any enquiries and investigations carried out. However, we will not be able to inform you of any matters which would infringe our duty of confidentiality to others.

You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way.

Summary of steps to be taken

Step 1: A disclosure is made by sending an email to concerns@keltbray.com. To ensure anonymity, private anonymised email addresses can be used or post your disclosure to Keltbray Head Office for the attention of the Keltbray Group People Director or In House Legal Counsel. If the matter concerns the People Team, then it will be distributed directly to the Chief Operating Officer.

Step 2: The Company will acknowledge receipt of the concern as soon as possible and will write to the employee making the disclosure with 10 working days. If the matter has been raised anonymously then the matter will follow the same process without the written confirmation.

Step 3: An independent senior manager will undertake a preliminary investigation, including an interview with the person raising the disclosure, which may be confidential if requested. The person making the disclosure can confirm if they want their identity to be disclosed and will be asked if they want to make a written statement. The person undertaking the interview will document a summary of the interview.

Step 4: A formal investigation may be required if the disclosure is very serious or complex. It may need to be carried out under strict confidentiality, i.e. not informing the subject of the complaint until it is necessary to do so.

The employee making the disclosure will be informed of the outcome of the investigation and any action taken, subject to the constraints of confidentiality and the law. If you do not feel the concern has been addressed adequately you may raise it internally or with an independent body such as one of the following:

- A relevant regulator
- A relevant voluntary organisation
- Trade Union
- The Police

If the result of the investigation is that there is a case to be answered by any individual, the Company disciplinary process will be used.

If no further action is required and the employee held a genuine concern and was not acting maliciously, the employee will not suffer any reprisals. However, if there is evidence the concern was made maliciously or for personal gain, disciplinary action will be taken.

Further information on whistleblowing can be found from the following sources:

https://www.gov.uk/whistleblowing https://archive.acas.org.uk/index.aspx?articleid=1919



Peter Burnside
Chief Executive Officer

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