John Paul Construction

Whistleblowing Policy

Background, Objective, and Scope

Whistleblowing (also known as protected disclosure) occurs when a worker raises a concern or discloses information which they reasonably believe relates to a "relevant wrongdoing" and which has come to their attention in a work-related context. The purpose of this policy is to give effect to the obligations and provisions of the Protected Disclosures Act 2014, the Protected Disclosures (Amendment) Act 2022 and Directive (EU) 2019/1937 of the European Parliament and of the Council on 23 October 2019 on the protection of persons who report breaches of Union law.

This non-contractual policy applies to everyone working at the company, which includes:

- Employees and former employees
- Contractors
- Agency workers
- Board and former Board members (including non-executive members)
- Shareholders and former Shareholders
- Trainees and former Trainees
- Job Applicants
- Individuals involved in pre-contract negotiations

Our Commitment

The company is committed to maintaining an open culture with the highest standards of honesty and accountability where all workers can report any concerns in confidence.

Our whistle-blowing policy is intended to encourage and enable workers to raise concerns within our workplace in confidence. Under this policy workers are entitled to raise concerns or disclose information without fear of penalisation or threat of less favourable treatment, discrimination, or disadvantage.

What is a Suspected Wrongdoing?

You may report any concerns and for the purposes of this policy, a relevant wrongdoing includes (but is not limited to) a reasonable belief that:

- a criminal offence has been or is likely to be committed;
- there has been or is likely to be a failure to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health and safety of any individual is or is likely to be endangered;
- there is, has been or is likely to be damage to the environment;
- there is, has been or is likely to be an incident of sexual harassment; or
- there is, has been or is likely to be a deliberate concealment of information relating to any of the above.

Prior to reporting the incident, you should ensure that you have a reasonable belief that the alleged incident has occurred, is occurring, or is likely to occur.

What Types of Concerns should *not* be raised under this Procedure?

A personal concern, for example a grievance around your own employment would not be regarded as a whistleblowing concern and would be more appropriately processed through our Grievance Procedure.

John Paul Construction

Whistleblowing Policy

Similarly, matters which are your function to detect, investigate or prosecute and which do not involve an act or omission by the company fall outside the scope of whistleblowing for the purposes of the Whistleblowing Legislation.

Safeguards and Detriment

A worker who blows the whistle will not be subjected to detriment by the company, even if the concerns or disclosure turn out to be unfounded. Detriment includes disciplinary action, discrimination, threats or other unfavourable treatment arising from blowing the whistle. If you believe that you are being subjected to detriment as a result of blowing the whistle under this procedure, you should inform your manager/director immediately.

Any person who victimises or retaliates against those who have blown the whistle under this policy will be subject to disciplinary action.

Employees are not expected to prove the truth of an allegation and employees should not undertake any investigation. However, they must have a reasonable belief that there are grounds for their concern. It should be noted that appropriate disciplinary action may be taken against anyone who is found to have raised a concern or raised a disclosure with malicious intent.

Confidentiality and Reporting

Any concerns will so far as reasonably practicable be dealt with in the strictest confidence at all times, although it must be recognised that in certain circumstances it will be difficult for us to pursue a complaint or to tackle an alleged wrongdoer without the complainant's identity becoming known. In that case, we may need to disclose the complainant's identity to that person or to a third party in order to give them a right of reply and/or to properly investigate the complaint but, provided that you reasonably believe the disclosure to be in the public interest, you will be protected against any detriment or victimisation arising out of the disclosure.

Anonymous Reporting

The company encourages workers to put their names to reports because it makes it easier for the company to appropriately follow-up, assess the report and take appropriate action including an investigation if necessary.

A report may be raised anonymously through the company's confidential reporting system. Anonymous reports will be reviewed to the extent possible. However, on a practical level, it may be difficult to investigate such a report or provide the relevant follow-up to the person who made the report.

How to Raise a Concern

Internal Reporting Channel

Protected disclosure reports can be made confidentially and securely through the company's confidential reporting system, available here.
The earlier you express the concern the easier it will be for the company to deal with the matter

Whistleblowing Policy

quickly.

Once a concern has been raised, a case manager will:

- Acknowledge receipt of your disclosure in writing within 7 days
- Carry out an initial assessment of your report to establish whether there is prima facie evidence that a relevant wrongdoing (as defined) has occurred. This may include meeting with you confidentially and/or requesting further information from you.

The case manager may conclude, after having carried out the initial assessment, that your report does not contain any prima facie evidence of a relevant wrongdoing. In this case, the case manager will write to you confirming this decision and the reason(s) for it. If there is another process which may be more relevant to the concern reported (such as the Grievance Procedure), you will be directed to this.

If, after having carried out the initial assessment, the case manager concludes that there is not prima facie evidence of a suspected wrongdoing, they will inform you within 3 months of acknowledging receipt of your report of any actions taken bearing in mind the obligation of confidentiality. If the investigation has not concluded within 3 months, you may request to be kept informed at 3 monthly intervals until the matter has concluded.

The form and scope of the investigation will depend on the subject matter of the whistleblowing disclosure.

The company may, in the light of the seriousness of the matters raised, refer reports of relevant wrongdoing immediately to the appropriate authorities. Likewise, if urgent action is required, (for example to remove a health and safety hazard), this action will be taken.

External Reporting Channels

The aim of this policy is to provide an effective internal process to deal with reports of relevant wrongdoing within the company.

The Whistleblowing Legislation recognises that there may be circumstances where it may be appropriate for a worker to make their report externally (e.g. to a regulator). We strongly encourage you to seek advice before reporting a concern to anyone external.