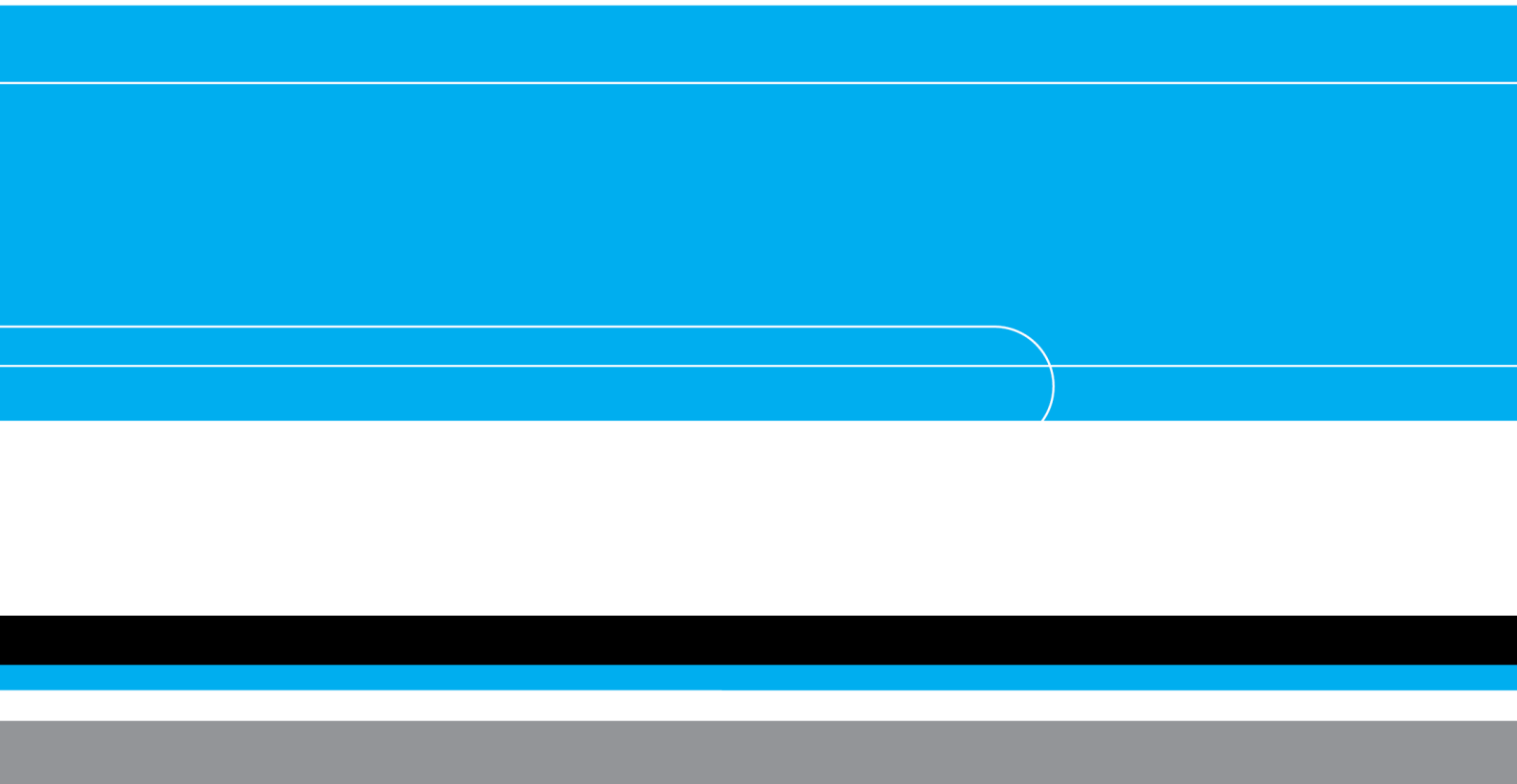


Whistleblowing Policy

September 2023



VolkerWessels UK Whistleblowing Policy

Issue 8, September 2023

1. PURPOSE

VolkerWessels UK (VW UK) takes malpractice very seriously and is committed to conducting the business with honesty and integrity and we expect all staff to maintain high standards too. It is therefore important to the business that any malpractice in relation to the activities we undertake is reported and properly dealt with. We therefore encourage all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

All staff have protection under whistleblowing laws if they raise concerns in the correct way. It does not matter if an individual who raises a concern is mistaken about it, staff do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have does show some malpractice.

This policy is supported by the board of VolkerWessels UK and each of its subsidiary Companies.

2. SCOPE

This policy applies to all employees, officers, consultants, contractors and to other workers including agency workers and temporary workers employed by any company within the VolkerWessels UK group of companies. All subcontractors and suppliers to any VolkerWessels UK company are also expected to adhere to it.

3. ABBREVIATIONS & DEFINITION OF TERMS

There are no Abbreviations or Definition of Terms required.

4. POLICY**4.1 Our policy**

This policy sets out how VolkerWessels UK expects its employees and representatives to behave in operations throughout the UK and for all its subsidiary Companies. Integrity will ensure the future success of our business and for this reason violation of this policy will be treated with the utmost seriousness in line with disciplinary procedures.

4.2 When to use this policy

There is a difference between whistleblowing and raising a grievance. Whistleblowing is where an individual has a concern about malpractice, wrongdoing or danger in relation to the company's activities where it is in the public interest to raise that concern. A grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work. If you have a grievance, this is covered by the *VolkerWessels UK Grievance Policy* and not this policy.

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that the disclosure is in the public interest and that any of the following is being, has been, or is likely to be committed:

- A criminal offence
- A miscarriage of justice
- An act creating risk to the health and safety of any individual
- An act causing damage to the environment
- A breach of any other legal obligation
- Deliberate concealment of any of the above

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4. POLICY (CONTINUED)**4.2 When to use this policy (Continued)**

An employee who makes such a protected disclosure has the right not to be dismissed or be subjected to any other detriment, or victimised, as a direct result of a disclosure he / she has made.

The Company encourages workers to raise their concerns under this policy in the first instance. If a worker is not sure whether or not to raise a concern, he / she should discuss the issue with the VW UK Compliance Officer (see section 4.5 Responsibilities and hotline and mailbox details).

Please note the following in relation to any whistleblowing reporting:

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- An allegation made in bad faith, maliciously or with a view to personal gain will be considered to be a disciplinary offence.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially., and the outcome of the investigation reported back to the employee who raised the issue. However, sometimes the need for confidentiality may prevent the Company from providing specific details of the investigation or any disciplinary action taken as a result. Any information provided should be treated as confidential information.
- No employee will be victimised for making a qualifying disclosure under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he / she has made such a disclosure.
- Victimisation of an employee for raising a qualifying disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the *VolkerWessels UK Disciplinary Policy* will be used, in addition to any appropriate external measures.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to their line manager or the VW UK Compliance Officer.

4.3 Procedure for raising a concern

If you are concerned about any form of malpractice covered by this policy, you can raise this concern by telephone, in person or in writing. Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, you will generally need to provide as a minimum details of the nature of the concern and why you believe it to be true and the background and history of the concern.

In the first instance contact your line manager or local HR representative and raise the concerns you have.

If for any reason you are not comfortable reporting your concern to your line manager or local HR representative, you can raise the issue with the VW UK Compliance Officer directly or make a telephone report via the confidential whistleblowing hotline or make a report via the Company dedicated integrity mailbox (see all of these details below).

If someone else raises a concern with you (whether as a line manager, HR adviser or in any other capacity), then you must not take action independently, but you must promptly report the matter to the VW UK Compliance Officer who will advise you what to do next.

All information supplied under the provision of the policy will be treated in confidence. Every effort will be made not to reveal the identity of an individual who raises a concern if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without the help of the individual who raised the concern, so the individual may be asked to come forward as a witness.

We hope that all staff will feel able to voice their concerns openly under this policy. Although a concern may be raised anonymously, we encourage you to provide your name when reporting your concern wherever possible. If this is not done, it will be much more difficult for us to investigate the issue or give feedback on the outcome of investigations.

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4. POLICY (CONTINUED)**4.4 Responding to concerns raised**

We are committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. Once a concern is raised, an appropriate person or persons will be appointed to investigate the matter. This may involve obtaining written and / or verbal statements from the person raising the concerns.

The matter will then be discussed at the relevant board level and a decision made as to appropriate action to be taken, which may include disciplinary action against employees found to have committed an act or acts of misconduct. The VW UK Compliance Officer will oversee all investigations to ensure they are conducted appropriately.

4.5 Responsibilities and hotline and mailbox details

All employees have a responsibility to carry out their roles and duties for the business with complete integrity, this includes disclosing any wrongdoing or potential wrongdoing they become aware of.

A dedicated integrity mailbox has been set up for reporting of all suspected breaches of integrity matters. The mailbox for this purpose is integrity@volkerwessels.co.uk

A confidential whistleblowing line has been set up for the purposes of reporting any potential wrongdoing by employees or representatives of VW UK. The telephone number is 01992 305 118 and messages can be left seven days a week, 24 hours a day and will be actioned as soon as possible. The VW UK Compliance Officer holds ultimate responsibility for implementing this policy. The VW UK Compliance Officer Role Holder is Jenny Scott-Russell, Legal Director (jenny.scott-russell@volkerwessels.co.uk).

4.6 Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. The Company aims to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the VW UK Compliance Officer immediately. If the matter is not remedied, you should raise it formally using the *VolkerWessels UK Grievance Policy*.

Staff must not threaten or retaliate against whistleblowers in any way. Any employee involved in such conduct may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue the employee personally for compensation in an Employment Tribunal.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and / or for personal gain and / or make an allegation they do not reasonably believe to be true will also be liable to disciplinary action.

4.7 Monitoring and Review

The VolkerWessels UK Compliance Officer will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

5. IMS AUTHORISATION**Document owner approval:**

Jenny Scott-Russell, Legal Director - 25.09.2023

Approval for IMS:

Andria Georgiou, IMS Coordinator - 25.09.2023

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