Whistle Blowing Policy 2025 – 2026

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Section

1.0 Introduction

1.1 SG Civil Engineering Ltd ('the Company') is committed to operating in an ethical and principled way by engaging the highest standards of openness, probity, and accountability.

1.2 An important aspect of accountability and transparency, therefore the aim of this policy and procedure is to provide individuals who engage with the company a mechanism for raising genuine concerns of breaches of the law, suspected bribery and / or other serious wrongdoings in a responsible and effective manner.

1.3 It is a fundamental term of every engagement that workers will faithfully serve the business and not disclose confidential information about the business affairs. Notwithstanding this, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be informed).

1.4 The Public Interest Disclosure Act 1998 gives legal protection to workers against being dismissed or penalised as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no workers should feel at a disadvantage in raising legitimate concerns.

1.5 It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

1.6 This policy will be reviewed on regular process in line with current legislation.

2.0 Scope of Policy

2.1 This policy is designed to enable workers of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures. These concerns could include:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation or Statutes;
- Dangers to Health & Safety or the environment;
- Criminal activity;
- Improper conduct or unethical behaviour;
- Attempts to conceal any of these.

3.0 Safeguard

3.1 **Protection** - this policy is designed to offer protection to those workers of SG Civil Engineering Ltd who disclose such concerns provided the disclosure is made:

- in good faith;

- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

3.2 **Confidentiality** - SG Civil Engineering Ltd will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

3.3 **Anonymous Allegations** - this policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised;
- The credibility of the concern;
- The likelihood of confirming the allegation from attributable sources.

3.2 **Untrue Allegations** - If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

4.0 Procedures for Making a Disclosure

4.1 On receipt of a complaint of malpractice, the supervisor who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Site Supervisor unless the complaint is against the Supervisor or is in any way related to the actions of the Supervisor. In such cases, the complaint should be passed to the Director for referral;

- In the case of a complaint, which is any way connected with but not against the Supervisor, the Director will nominate a Senior Manager or external party to act as the alternative investigating officer;

- Complaints against the Director should be passed to the HR Manager who will nominate an appropriate internal / external investigating officer;

- The complainant has the right to bypass the line management structure and take their complaint direct to the Director. The Director has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

- Those working at an office base should contact their Line Manager directly.

4.2 Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach the following individual who has been designated and trained as independent point of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

- Helen Gallagher – Finance Manager, SG Civil Engineering Ltd.

4.3 If there is evidence of criminal activity then the investigating officer should inform the police directly in the first instance. The Company will ensure that any internal investigation does not hinder a formal police investigation.

5.0 Timescales

5.1 Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

5.2 The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed.

5.3 If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

5.4 All responses to the complainant should be in writing and sent to their home address marked "confidential".

6.0 Investigating Procedure

6.1 The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained;

- The investigating officer should inform the worker against whom the complaint is made as soon as is practically possible. The worker will be informed of their right to be accompanied by a trade union or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed e.g. the individual's legal representative.

- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the Business Owner if appropriate

- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.

- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the HR Manager as appropriate.

- The HR Manager will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.

- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

6.2 If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the HR Manager, or one of the designated persons described above.

6.3 If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, SG Civil Engineering Ltd recognises the lawful rights of workers to make disclosures to prescribed persons or body (e.g. the Health and Safety Executive). A full list of prescribed people and bodies can be found on the Government Website (www.gov.uk).

S Gallagher
Operations Director
SG Civil Engineering Ltd

1st June 2025