

WHISTLE BLOWING POLICY STATEMENT

INTRODUCTION:

All organisations face the risk of things going wrong or of unknowingly harboring malpractice. J Coffey Construction believes it has a duty to identify such situations and take the appropriate measures to remedy them. By encouraging a culture of openness within our organisation the Company believes it can help prevent malpractice. Furthermore, by knowing about malpractice at an early stage the Company stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, J. Coffey Construction encourages you to 'blow the whistle' on suspected malpractice. Please be aware that this policy is not the procedure for general grievances. If you have a complaint about your own personal circumstances then you should use the normal grievance procedure. If you have concerns about malpractice within the Company you should use the procedure outlined in this policy.

SUSPECTED MALPRACTICE:

The Company encourages you to report suspected malpractice in relation to our activities. We construe malpractice widely and this includes:

- Any illegal activity at the Company;
- Any activity that causes the Company to breach its legal obligations;
- Any activity that causes the Company to endanger the health and safety of any person;
- Any activity that damages the environment;
- Any attempt to willfully conceal any information that tends to show malpractice.

You are not required to obtain evidence of malpractice before raising your concern. As such you must not commit an act or acts of misconduct, breach company rules or damage the Company in any way in order to obtain information. The Company is committed to ensuring that you work in an environment in which you can raise concerns and there is no question of you having to prove anything. The Company will support employees, who with the reasonable belief that it is in the public interest to do so raise concerns under this policy, even if they turn out to be mistaken.

How to raise your concern internally

If you feel able to do so you should tell your Manager about your concern. There is no special procedure for doing this - you can tell your Manager about the problem, or put it in writing if you prefer. If you feel you cannot tell your Manager, for whatever reason, please raise the issue with the HR Advisor.

If you have raised your concerns and you are still concerned, or the matter is so serious that you feel you cannot discuss it with the person named above, you should raise the matter with the Managing Director.

HOW THE COMPANY WILL RESPOND:

After you have raised your concern the Company will decide how to respond in a responsible and appropriate manner under this policy. 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.

As far as possible, the Company will keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform you of any matters that would infringe the duty of confidentiality owed to others. If you ask for a matter to be treated in confidence the Company will respect your request and only make disclosures with your consent.

Raising your concern externally (exceptional cases)

The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take.

However, if you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with an appropriate 'prescribed person'. The identity of the appropriate prescribed person will depend on the nature of your concern. However, they must be one of those prescribed by an order made by the Secretary of State for the purposes of the Employment Rights Act 1996 Section 43F. The Public Interest Disclosure (Prescribed Persons) Order 2014 (as amended) lists the prescribed persons.

If you have good reasons for not using the internal disclosure procedures or the disclosure procedure described above, you may consider making wider disclosure by reporting the matter to the police or to the media, for example. However, whistleblowers who make wider disclosures of this type will only be protected in certain circumstances. The Company recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.

PROTECTION OF WHISTLE BLOWERS:

You may be worried that by reporting your concerns you will be opening yourself up to victimisation or detriment, or risking your job security. However, all staff benefit from statutory protection if they raise concerns in the right way and do so with the reasonable belief that raising the concern is in the public interest. This protection means that employees must not be dismissed or suffer any detrimental treatment as a result of raising a concern. As it will be in your own interests to do so we would encourage you in particular to ensure you have a reasonable belief that the disclosure you wish to make is in the public interest as this is one of the requirements that must be met in order to obtain the statutory protection mentioned earlier.

Staff must not threaten or retaliate against whistleblowers in any way. This will be regarded as gross misconduct and may result in those involved being dismissed without notice or payment in lieu of notice.

If you believe that you have suffered any detrimental treatment, you should inform the Managing Director immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure

This policy applies to all employees and other personnel engaged in J Coffey Construction operations:

Signed: E. Barrett (Original Signed) Date: 14.01.2022

Eddie Barrett

Group Managing Director

On behalf of J. Coffey Construction