

WHISTLEBLOWING POLICY

Business Scope

Provision of Civil, Electrical and Mechanical Services to the Commercial, Industrial and Public Sectors, within the UK. These services are coordinated through a head office complex and delivered in the field via skilled and trained operators. The laying of Asphalt Mixes by hand and machine in accordance with National Highways Sector Scheme 16.

Introduction

Northavon Group Limited encourages good communication with staff and co-workers at all levels throughout the organisation. We do however acknowledge that things go wrong from time to time or that there may be situations when organisations face malpractice. We, as a Company, have to take measures to identify and attempt to rectify such situations. In line with this, we encourage all to raise genuine concerns without fear of reprisal and be assured that Northavon Group Limited will protect them from victimisation and dismissal.

Purpose of the policy

The purpose of this Policy is to ensure that employees are aware that the Company undertakes to take appropriate action following any disclosure of malpractice in the workplace and to take steps to protect its workers from detrimental treatment or dismissal if they raise concerns in good faith.

The legal scope of the Public Interest Disclosure Act 1998, on which this Policy is based, covers UK staff.

The Policy introduces procedures to enable workers to raise or disclose concerns about malpractice in the workplace in the correct way and they apply in all cases where there are genuine concerns regardless of where this may be.

The term "malpractice" includes:

- Criminal offences.
- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law).
- Miscarriages of justice.
- Health and Safety.
- Damage to the environment.

- The concealment of any of the above

This list is not exhaustive.

Reporting Malpractice

If a concern is raised in good faith and it is discovered that the individual was mistaken, under this policy the individual will not be at risk of losing their job or suffering any form of retribution as a result. This assurance will not be extended to any individual who maliciously raises a matter they know to be untrue or who is involved in any malpractice.

The following procedure must be followed by all employees

- The issue should be raised with your line manager
- Where this is not appropriate because the line manager is involved in some way this must be raised directly with a Director of the Company

- You may raise the concern verbally or in writing and should include full details of the allegation
 - You must state that you would like the matter addressed in line with the Whistleblowing Policy
- Every effort will be made to keep the matter and your identity confidential, at least until any formal investigation is underway. So as to not jeopardise the investigation into the alleged malpractice, you will be expected to keep the matter confidential.

There may be instances where, due to the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with disciplinary or legal investigations or proceedings. In such circumstances, we will make every effort to advise you that your identity is likely to be exposed. If it is necessary for you to participate in any investigation we will, so far as reasonably practicable, take steps to keep the fact that you made the original disclosure confidential.

Should an investigation lead to criminal prosecution, it may become necessary for you to provide evidence to legal bodies or be interviewed by the police. In these circumstances' confidentiality will be exercised wherever possible.

The matter will be taken seriously, and the following procedure will be used:

- You must disclose any interest you have in the disclosure at the outset
- Your disclosure will be acknowledged in writing and we will get back to you in due course • An independent person will be identified to manage the disclosure.
- You may be asked to provide evidence during the investigation and will be expected to comply so that the matter can be resolved.
- On investigation, any appropriate action will be taken, and you will be notified in writing although all details may not be disclosed due to infringement of human rights.

Northavon Group Limited will review and implement any corrective action to prevent any repeat of the incident.

References:

Public Interest Disclosure Act 1988

Signed:



Mike Clancy
Group Managing Director
9 January 2023