



Property | Maintenance | Fire Safety | Electrical

WHISTLEBLOWING POLICY

In accordance with the Public Interest Disclosure Act 1998

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Document control

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Policy statement

GND Group is committed to the highest standards of openness and accountability. This policy encourages employees and others to raise genuine concerns about wrongdoing without fear of reprisal, in line with the Public Interest Disclosure Act 1998.

Whistleblowing is the raising of a concern about a wrongdoing in the public interest. It is different from a personal grievance, which is dealt with under the grievance procedure.

What can be raised

Concerns that may be raised under this policy include:

- danger to health and safety;
- criminal activity, fraud or bribery;
- failure to comply with a legal or regulatory obligation;
- damage to the environment;
- the deliberate concealment of any of the above.

How to raise a concern

Concerns should normally be raised with the Managing Director. If that is not appropriate, they may be raised with another senior person. Concerns should be raised as early as possible and with as much detail as possible.

Protection

No one who raises a genuine concern in good faith will suffer any detriment as a result, even if the concern turns out to be mistaken. Victimisation of a whistleblower is a disciplinary matter. Concerns can be raised confidentially.

External disclosure

We would prefer concerns to be raised internally first, but individuals may contact a prescribed external body, such as the relevant regulator or the independent charity Protect, where appropriate.

Responsibilities

Overall responsibility for this policy rests with the Managing Director, Raheel Deen. Day-to-day responsibility is delegated to Harry Fodden. Managers must take any concern seriously and must not victimise anyone who raises one.

This policy is communicated to all employees and is available to clients, subcontractors and other interested parties on request. It is reviewed at least annually and following any relevant change in law or circumstances.

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|-------------|------------------------------|
| Raheel Deen | 10.6.26 |
| Signed | Date |
| Raheel Deen | Managing Director, GND Group |