

<b>John Henry Group</b>	<b>Whistleblowing Policy</b>	
<b>Reference Number:</b> POL-JHG-HR005	<b>Version Number:</b> 3	
<b>Published Date:</b> 17/04/2025	<b>Next Review Date:</b> 16/04/2028	
<b>Document Owner:</b> Head of People	<b>Approved By:</b> Director of Support Services	

## Introduction

The John Henry Group is committed to maintaining the highest standards of integrity, accountability and openness and it is important to the business that any fraud, misconduct or wrongdoing by those working for or on behalf of the Group is reported and properly dealt with. Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work.

The John Henry Group recognises that raising a whistleblowing concern may be daunting. However, The Group encourages you to report concerns internally as soon as possible where you suspect wrongdoing. The Group is here to listen, and will take all concerns that you raise seriously.

This policy applies to all individuals that work for and on behalf of the John Henry Group including directly employed, contractors/agency staff, freelance Operatives and Sub-Contractors.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise this under our separate grievance procedure.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to a member of the HR team for further advice.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

This policy does not form part of your contract of employment, and The Group reserves the right to amend or withdraw it at any time.

## Whistleblowing concerns to which this policy relates

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- A risk to the health and safety of an individual
- Damage to the environment
- An attempt to cover up any of the above

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

## Procedure

### Stage 1 – Raising a whistleblowing concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise your concern with any of the below:

- A member of the HR Team
- Head of People
- A senior manager that reports directly to the Senior Leadership Team and/or
- A Member of the Senior Leadership Team and/or Group Board

On escalation of a concern under the whistleblowing policy, the person receiving the disclosure will immediately notify the CSO and/or the CEO/Deputy CEO.

You can raise your concern orally, or in writing. It is important that you set out clearly:

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- The details of the suspected wrongdoing
- The names of any individuals involved and
- What action (if any) you are seeking

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR Team may also be present.

### Step 2 – Responding to your whistleblowing concern

Disclosures will be carefully and thoroughly investigated by an appropriate member of staff ('Investigating Officer') that will be nominated by the CSO and/or the CEO after notification to them following stage 1. The relevant person will write to you confirming that they are conducting an investigation and the timescale they anticipate for completion.

The level of investigation and time this may take will vary depending on the nature of the suspected wrongdoing.

The investigation may require the worker and other individuals involved giving a written statement. Employees have the right to be accompanied to these meetings by a colleague or a trade union representative. The investigating officer will then report to the CSO and/or the CEO, who will review the investigation report and take any necessary action, including reporting the matter to the wider SLT, Group Board, appropriate government department, regulatory agency and/or the police if necessary.

If disciplinary action is required, this will be undertaken in line with the company disciplinary procedure.

Once the investigation has concluded, the relevant manager will inform the individual in writing as quickly as possible with the outcome and any next steps or actions that will be taken. While the Group aims to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential. If no action is to be taken, the reason for this will be explained.

### Stage 3 - Appeal

If you are not satisfied with how your concern has been dealt with, or you are concerned that the investigating officer is involved in the wrongdoing, has failed to make a proper investigation, or has failed to report the outcome in line with this policy, you should appeal to the Head of People, which will then be reviewed directly by a member of the Group Board.

You can raise your appeal orally, or in writing. It is important that you set out clearly the grounds of your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR Team may also be present.

The relevant manager will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

If the appeal is upheld, the Group Board member will arrange for another manager to review the investigation and make their own report into the disclosure. The Group Board member will review the second investigation report and take any necessary action, including reporting the matter to the wider Group Board, appropriate government department, regulatory agency and/or the police if necessary.

This approach will be treated with the strictest confidence and the worker's identity will not be disclosed without their prior consent.

### **Confidentiality and anonymity**

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The John Henry Group want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, the Group will maintain your confidentiality as far as possible. If the Group need to identify your identity to anyone, the Group will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously. The Group encourages anonymous reporting over remaining silent. Although the Group will investigate any concern that is reported anonymously as best the Group can, any anonymous report is likely to be more difficult for the Group to investigate and the Group will not be in a position to provide you with any feedback.

### **Our commitment to you**

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined, or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance to the policy, the Group will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the Head of People. In the alternative, you can raise it under our grievance procedure.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If the Group finds that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence and will be dealt with under our disciplinary procedure.

### **Raising your whistleblowing concerns externally**

The John Henry Group encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person. A full list of prescribed bodies or persons can be found on [GOV.UK](https://www.gov.uk).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

The John Henry Group will co-operate fully with enquires made by an external party and any subsequent investigation that may arise. During such enquires, the Group will make every effort to protect the anonymity of those involved in any internal investigation that had previously been undertaken by the Group.

### **Further guidance**

If you need further guidance or support, you can contact the whistleblowing charity Protect or Citizens Advice for free confidential advice.