



PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING) POLICY

The Public Interest Disclosure Act 1998 protects workers who raise legitimate concerns about specified matters from being dismissed by the company or subjected to detrimental treatment by either the company or work colleagues as a result, provided certain criteria are met.

The Act makes provision about the kinds of disclosure that may be protected and the circumstances in which disclosures are protected. These rules are therefore intended to comply with the act by encouraging employees to make disclosures about fraud, misconduct, bribery or other wrongdoing, to the company, without fear of reprisal. In doing so problems can be identified, dealt with and resolved quickly.

The company's policy is to enable workers to raise protected disclosures to them and to support those workers who do. Employees must not victimise, subject to detrimental treatment or retaliate against an employee, worker, agency worker, consultant who has made a protected disclosure. This policy outlines the company's commitment to managing disclosures under this legislation.

The company is fully committed to addressing other issues which fall outside of the Public Interest and these would be managed through the appropriate procedure such as the company's Grievance Procedure for our employees.

QUALIFYING DISCLOSURES

Certain kinds of disclosure qualify for protection. These are disclosures of information that you reasonably believe are made in the public interest and tend to show one or more of the following relevant failures is either currently happening, took place in the past, or is likely to happen in the future:

- A criminal offence, including offences such as theft, fraud or acts of bribery
- The breach of a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate concealment of information tending to show any of the above five matters

Disclosures of information that fall within one or more of these six categories qualify for protection under this legislation.

Your belief must be reasonable, but it need not be correct. It might be discovered subsequently that you were in fact wrong or mistaken in your belief. When raising a concern you should be able to demonstrate a reasonable belief at the time of disclosure but it is not your responsibility to investigate the matter, rather it is the company's responsibility to look into the concerns that you have raised.

As the legislation covers disclosures which are in the public interest it will not include disclosures that can properly be characterised as being of a personal rather than a wider public interest, for example a disclosure about a breach of the terms of your own contract of employment, which does not affect anyone else. Under these circumstances you should raise concerns outside of this policy such as the company's grievance procedure.

PROTECTED DISCLOSURES

There are a number of methods by which you can make a protected disclosure but, the company always encourages all employees to raise any disclosure internally in the first instance.



You are protected if you make a qualifying disclosure to either:

- The company or
- The person, where you reasonably believe that the relevant failure relates solely or mainly to the conduct of the person other than the company or any other matter for which a person other than the company has legal responsibility.

You are encouraged to raise any qualifying disclosures that you may have by following the disclosure procedure set out below.

THE DISCLOSURE PROCEDURE

This procedure applies to all permanent and temporary employees and workers. In addition, third parties such as agency workers, consultants and contractors and any others who perform functions in relation to the company should use it.

The procedure is as follows:

1. If you wish to make a qualifying disclosure, please report the situation in writing to your line manager, setting out in detail the nature of your concern. If you do not wish to contact your line manager, you can contact an alternative manager. For other workers and contractors you should report the situation to our People and Talent Director – sarah.whittle@knightsbrown.co.uk
2. Such disclosures should be made as soon as possible so that any action can be taken quickly.
3. All qualifying disclosures will be treated seriously. The disclosure will be promptly investigated and, as part of the investigatory process, we will ask you to attend an interview in order for the company to understand your concerns better. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, the company may need to discuss such concerns with the relevant individuals who

should be informed of or interviewed about the disclosure. The company will discuss confidentiality with you throughout the process. The Company reserves the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.

4. Once the investigation has been completed you will be informed in writing of the outcome and the company's conclusions and decision as soon as possible. The company is committed to taking appropriate action with respect to all qualifying disclosures that are upheld.
5. We support all employees who raise such concerns regardless of the outcome. However if it is identified during the investigation that a disclosure is false and has been made with malice, action will be taken under the company's disciplinary procedure.
6. Once the company's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained to you.
7. If, on conclusion of the above stages, you reasonably believe that appropriate action has not been taken, you may then report the matter externally to the proper authority in accordance with the provisions of the act. The act sets out a number of prescribed external bodies or persons to which qualifying
8. Disclosures may be made and you can access these at: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

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GENERAL PRINCIPLES

- Be aware of the importance of eliminating fraud, misconduct, bribery or other wrongdoing at work. Report anything that you become aware of that is illegal or unlawful.
 - You will not be victimised, subjected to a detriment or dismissed for raising a protected disclosure under this procedure.
 - Victimisation of an employee or worker or subjecting them to any form of detrimental treatment or retaliation (including bullying and harassment), for raising a protected disclosure under this procedure will not be tolerated by the company, is a disciplinary offence and will be dealt with under the company's disciplinary procedure. Depending on the seriousness of the offence, it may amount to potential gross misconduct and could result in summary dismissal.
 - Be aware that you can also be held personally liable for any act of victimisation or detrimental treatment of an employee or worker on the ground that they made a protected disclosure.
 - You should immediately draw the attention of your line manager to suspected cases of victimisation or detrimental treatment related to either you or another employee or worker having made a protected disclosure.
 - Covering up someone else's wrongdoing is also a disciplinary offence. Never agree to remain silent about a wrongdoing, even if told to do so by a person in authority, such as your line manager.
 - Your right to make a protected disclosure under this procedure overrides any confidentiality provisions in your contract of employment.
 - Finally, maliciously making a false allegation is a disciplinary offence. If you are a third party, such as an agency worker, consultant or contractor, it could result in your engagement being terminated.
- This policy does not form part of the contract of employment and may be amended by the company from time to time.



KEVIN VALENTINE | MANAGING DIRECTOR
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