

## SCOPE

This document establishes the Whistleblowing Statement of Approach for Galliford Try Employment Limited. References in this policy to the 'Company' are to Galliford Try Employment Limited. References in this policy to 'our people' are to employees of Galliford Try Employment Limited.

This policy covers all employees, officers, clients, subcontractors, consultants, contractors, agency workers and third parties.

## PURPOSE

Galliford Try Employment Limited will fulfil our responsibilities to our shareholders, customers, employees, business partners and the wider community by conducting all aspects of our business at the highest level of excellence and professionalism, and by operating in an ethical manner. To meet these standards, we rely on all our people, irrespective of their role within the organisation, to point out ways in which we can improve the conduct of our business and make our decisions within a clear ethical framework.

The Galliford Try Employment Limited Whistleblowing Policy will be brought to the attention of all our people. This policy is not part of our people's contract of employment and may be amended by the Company from time to time. It will be reviewed annually.

## GENERAL DATA PROTECTION REGULATION

Be aware that whenever we are collecting, using, retaining, transferring or disposing of any information about a person ("processing of personal data") in connection with the subject matter of this policy we have numerous obligations under the General Data Protection Regulations (GDPR). Any failure to comply with GDPR can have serious results including breach of the person's rights and financial penalties for the Company. You must not proceed with any processing of personal data unless you have first read and complied with the Group Data Protection Policy, reference HR-POL-004, which can be found on the HR policy page of Galileo. If you have any questions about GDPR compliance please contact the Group Chief Information Officer, the Head of Information Security and Compliance or Legal Services.

## INPUTS

| Reference No. | Type   | Title            |
|---------------|--------|------------------|
| HR-POL-010    | Policy | Grievance Policy |

## 1. When To Use This Policy

Whistleblowing involves a concern about a danger, illegality, unethical, improper conduct or behaviour that has a public interest aspect to it, e.g. because it threatens our people, clients, third parties or the public. We encourage a culture of openness, allowing all our people, clients, third parties and those in our clients and supply chain to raise and resolve any ethical issues or problems as quickly as possible. We encourage the supply chain staff to report directly to us on our operations. Every person should consider it their responsibility to bring malpractice or ethical concerns promptly to the Company's attention. They should do so if they are genuinely concerned that a business activity of the Company, its people or its supply chain might involve:

- Criminal activity including but not limited to:
  - Fraud deception and dishonesty;
  - Bribery and corruption including but not limited to:
    - relationships with agents and other third parties;
    - facilitation payments;
    - gifts and hospitality;
  - Conflicts of interest;
  - Breaches of competition or anti-trust law;
  - Insider trading;
  - Breaches of import, export and trade controls;
- Failure to comply with any legal obligations or regulatory requirements;
- Bullying, harassment or discrimination;
- Sexual Harassment (unwanted conduct of a sexual nature including past, current or potential future incidents).
- Breaches of human rights, including slavery;
- Health and safety matters and damage, or risk of damage, to the environment;
- Unauthorised disclosure of confidential information;
- Misuse of company property or computer systems;
- Not following our financial controls;
- Any other breach of our values or the Code; or
- The deliberate concealment of any of the above matters.

There is a difference between whistleblowing and raising a grievance; a grievance generally relates to an individual's own employment position and does not have an additional public interest dimension. For grievances relating to their employment, individuals should follow the Company Grievance policy.

## 2. How to Use This Policy

Our people, clients, third parties and supply chain staff are encouraged to raise concerns based on the following levels of seriousness:

- Minor concerns and where appropriate may be dealt with by talking directly to the person or manager whose conduct is causing concern.
- If they are unable to talk directly with the person or feel it is inappropriate, generally they should first bring their concern to the attention of a manager or supervisor.
- Alternatively, they can report their concern to a member of the Legal or Human Resources team.
- If they do not feel comfortable raising their concern or question through the above channel, they can contact Safe Call anonymously.

The Safe Call hotline is a safe, independent and confidential service through which individuals can report their concerns, including anonymously. All reports will be treated seriously and will be investigated without bias and with absolute discretion.

Safe Call details are as follows:

UK Freephone – 0800 915 1571

[www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Any concerns about the Legal or Human Resources contact should be reported to the HR Director. If any person believes the problem is of an extremely serious nature and is reluctant to raise the matter with any of the individuals named above, they can report their concerns to the General Counsel & Company Secretary.

### **3. Responding to Concerns Raised**

The Company will take prompt steps to investigate any concerns raised thoroughly, and remedy any issues brought to our attention in accordance with this whistleblowing policy. Reports will be held confidential and, where required, we will ensure anonymity wherever possible.

If a person raises a concern they will, where appropriate, be informed of the progress of the investigation carried out and when it is completed, but please note that we will not be able to inform them of any matters that would infringe the duty of confidentiality owed to others.

If any person raises a genuine concern, we give our assurance that they will not suffer any form of retribution or detrimental treatment. Any person who victimises a whistleblower will be liable to disciplinary action. To ensure the protection of all our people, those who maliciously make a false allegation may be liable to disciplinary action.

### **4. Responsibilities**

Responsibility for this Policy ultimately lies with the Galliford Try Chief Executive. Day to day implementation of the policy is the responsibility of operational management and functional heads responsible for the provision of specialist legal support. All our people have a responsibility to comply with this policy and its associated arrangements.

### **5. Useful Contacts**

HR Hub by telephone on 01455 231828 or by email to [HR.Hub@gallifordtry.co.uk](mailto:HR.Hub@gallifordtry.co.uk)

Local HR contacts for advice and guidance

Safe Call on 0800 915 1571 or [www.safecall.co.uk](http://www.safecall.co.uk).