

WHISTLEBLOWING POLICY

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1. Aims of this policy

- 1.1 This policy applies to the Hills group of companies and relates specifically to the employee's employment, and where applicable, the agency worker or self-employed contractor's engagement, with the relevant Hills group company.
- 1.2 Reference to the "Company" throughout this policy is reference to the relevant Hills group company.
- 1.3 The Company is committed to conducting its business with honesty and integrity and it expects all employees to maintain high standards in accordance with the Company's Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to maintain a work environment in which all employees can raise genuine concerns about poor or unacceptable practices or misconduct without fear of reprisal.
- 1.4 The purpose of this policy is:
 - a) To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - b) To provide employees with guidance as to how to raise those concerns.
 - c) To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.5 This policy does not form part of any contract of employment or other contract to provide services, and the Company may amend it at any time.

2. Who does this policy apply to?

- 2.1 This policy applies to all employees, consultants, self-employed contractors; agency workers and appointed sub-contractors. In limited circumstances it may also be used by members of the public; customers and suppliers.

3. What is whistleblowing?

- 3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work believed to be in the public interest. This may include:

- a) Criminal activity;
 - b) Sexual harassment;
 - c) Failure to comply with a legal obligation;
 - d) A miscarriage of justice (such as one employee making a false statement alleging wrongdoing by another employee);
 - e) Danger to the health and safety;
 - f) Damage to the environment;
 - g) Unethical or improper conduct; or
 - h) The deliberate concealment of any of the above
- 3.2 A matter is in the public interest if it affects, or has the potential to affect, the interests of the public, third parties, or a group of employees. A whistleblower is a person who raises a genuine concern relating to any of the above. If an employee or any person to whom this policy relates has any genuine concerns related to suspected wrongdoing or danger affecting any of the Company's activities (a whistleblowing concern) they should report it under this policy. In doing so this is called a "protected disclosure" and the employee raising the concern will be offered protection in accordance section 9 of this policy
- 3.3 This policy should not be used for complaints relating to an employee's own personal grievance relating to their employment contract. In those cases, the employee should use the Company's Grievance Procedure.
- However, where a disclosure relates to an employee's treatment directly arising from circumstances that meet the criteria of a protected disclosure, it may be raised under this policy.
- 3.4 If an employee is uncertain whether something is within the scope of this policy, they should seek advice from their Line Manager or should an employee wish to remain anonymous an independent advisor listed in section 11 below .

4. Raising a whistleblowing concern

- 4.1 The Company hopes that in many cases, employees will be able to raise any concerns with their line manager. Employees can inform their line manager of their concerns in person or in writing. In some cases, the employee's line manager may refer the matter to the Company's divisional group director.

4.2 Where the matter is more serious or an employee feels their line manager has not addressed their concern, or they would prefer not to raise it with their line manager for any reason, employees should contact one of the following:

- a) The Company's divisional group director.

The Company's confidential external whistleblower reporting line (**Contact details are set out at the end of this policy**).

5. Raising a concern confidentially

5.1 If an employee wishes to raise a concern confidentially, the Company will make every effort to keep the employee's identity secret. If it is necessary for anyone investigating the concern to know the employee's identity, the Company will discuss this with the employee.

5.2 The Company do not encourage employees to make disclosures anonymously, although it will make every effort to investigate anonymous disclosures. Employees should be aware that proper investigation may be more difficult or impossible if the Company cannot obtain further information from employees. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should speak to their line manager or one of the other contact points listed at paragraph 4.2, and appropriate measures can be taken to preserve confidentiality. If employees are in any doubt, they can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

5.3 However if an employee wishes to anonymously raise a concern they may do so via the company's independently operated whistleblower reporting line who will record details of the concern and pass this on the company to investigate as detailed in this policy and provide the opportunity for a person to receive feedback on the concern via the phonenumber.

6 Investigation and outcome

6.1 Once an employee has raised a concern, the Company will arrange a meeting with the employee as soon as possible to discuss their concern. Employees may bring a colleague or union representative to any meetings under this policy. Companions must respect the confidentiality of the employee's disclosure and any subsequent investigation.

6.2 The Company will take down a written summary of the employee's concern and provide them with a copy after the meeting. The Company will also aim to give the employee an indication of how it proposes to deal with the matter.

- 6.3 The Company will carry out an initial assessment to determine the scope of any investigation and will inform the employee of its assessment. Employees may be required to attend additional meetings in order to provide further information.
- 6.4 In some cases, the Company may appoint an investigator or team of investigators. The investigator (or investigators) may make recommendations for change to enable the Company to minimise the risk of future wrongdoing.
- 6.5 The Company will aim to keep the employee informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent it from giving the employee specific details of the investigation, an outcome or any disciplinary action taken as a result. Employees should treat any information about the investigation as confidential.
- 6.6 If the Company concludes that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

7. If an employee is not satisfied

- 7.1 If following completion of any investigation an employee is not satisfied with the outcome, they can raise it with their Group Director. below.

8. External disclosures

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases employees should not find it necessary to alert anyone externally.
- 8.2 The law recognises that in some circumstances it may be appropriate for employees to report their concerns to an external body. It will very rarely if ever be appropriate to alert the media. The Company strongly encourages employees to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.
- 8.3 Whistleblowing concerns usually relate to the conduct of the Company's employees but they may sometimes relate to the actions of a third party, such as a customer or client or supplier. In some circumstances the law will protect employees if they raise the matter with the third party directly. However, the Company encourages employees to report such concerns internally first, in line with this policy. Employees should contact their line manager or one of the other individuals set out in paragraph 4.2 for guidance.

9. Protection and support for whistleblowers

- 9.1 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, they should raise it formally using the Company's Grievance Procedure.
- 9.2 Employees must not threaten or retaliate against whistleblowers in any way. If employees are involved in such conduct, they may be subject to disciplinary action.
- 9.3 The Company have appointed Safecall, an independent support service, to operate the confidential whistleblower reporting line detailed in this policy. Their contact details are set out below.

10. Confidentiality and Data Protection

- 10.1 HR and all managers are reminded that they need to ensure that confidential personal information is confined to those who require the information for the purposes of carrying out their duties.
- 10.2 Employees and anyone accompanying them must not make electronic recordings of any meetings conducted under this policy, whether these meetings are conducted in person, by telephone, or using remote working platforms or technologies.

11. Contacts

Whistleblowing (24 hour confidential reporting line)	Safecall Reporting line: 0800 915 1571 Website: safecall.co.uk
Employee Assistance Programme	BUPA: 24 hour helpline: 0800 269 616
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: protect-advice.org.uk

VERSION CONTROL VERSION	DATE	OWNER	CHANGES MADE	REVIEW DUE
V4	01/04/2026	Company Secretary	ERA 2025- Addition of sexual harassment as a protected disclosure.	01/04/2029