Whistleblower Policy and Procedure

Purpose

H Foster is committed to maintaining the highest standards of ethics, integrity, honesty, professional conduct and accountability within all of the organisation's activities. The company recognises the role that every team member has in safeguarding these standards, and hence, have established this Whistleblower Policy and Procedure.

Scope

This policy applies to all Workers associated with H Foster.

Whistleblowing legislation offers protection under the Public Interest Disclosure Act. There is protection by law if you report any of the following:

- a criminal offence, for example fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example, does not have the right insurance
- you believe someone is covering up wrongdoing
- reporting sexual harassment concerns

Personal grievances (for example bullying, harasment and discrimination) are not covered by whistleblowing law, these should be reported under the company's Disciplinary and Grievance Procedures detailed in the staff handbook. The designated Investigator will advise the person making the Disclosure of this and discuss appropriate alternative routes of taking the matter further.

Protection

This policy offers protection to workers making a Disclosure in the public interest in accordance with this procedure. They will not be subjected to a detriment of any kind because of making the Disclosure. Any worker who victimises a person making a Disclosure under this procedure could be subject to disciplinary action including potential dismissal and/or face a civil claim in their personal capacity.

Confidentiality

If requested to do so, the Company will seek to keep the identity of the person making any Disclosure confidential. However, there are situations where, due to the circumstances of the alleged wrongdoing, it may be difficult to avoid divulging information which identifies the person who made the Disclosure. In these circumstances, the Company will consult with the person making the Disclosure prior to identifying information being disclosed.

For legal reasons there may be circumstances where the Company may be obliged to disclose information which identifies the person who made a Disclosure, such as in conjunction with legal proceedings or to third parties for the purposes of investigations (e.g. the Police). In these circumstances, the Company will discuss the issues with the person making the Disclosure and where appropriate explore support arrangements.

Anonymous Disclosures will be considered but, depending on the information given and the credibility of any evidence available, there may not be enough information for the Company to properly pursue an investigation.

Persons who wish to make a Disclosure under this procedure may wish to consult the UK Government Guidance on what constitutes a Disclosure. 'ACAS' (The Advisory, Conciliation and Arbitration Service) and 'Protect' (the independent whistleblowing charity) also provide guidance on whistleblowing. Contact details for these bodies can be located in Appendix 1.

Procedure

This whistleblowing procedure is designed to assist with the investigation of, and, where appropriate, acting upon a disclosure of information or allegation of serious wrongdoing made by a person, or persons, to the company which is in the public interest.

Step 1: Reporting

Workers are encouraged to report any wrongdoing or suspected violation to their immediate supervisor. If uncomfortable with this step, or for more serious matters, they may escalate it to the MD..

- Reports can be made verbally or in writing and may also be submitted anonymously.
- The Company will endeavour to acknowledge receipt of the Disclosure within 10 working days.

Step 2: Agree the use of this Procedure and appoint an Independent Investigator

Upon receiving a report an appropriate internal independent investigator will be appointed. If necessary, consultation with the company's legal advisers will take place.

- The use of this procedure does not automatically amount to an acceptance that the information provided amounts to a Disclosure.
- The Company will, where possible, inform the person making the Disclosure whether this procedure will be invoked within 10 working days of Step 1 above.

Step 3: Investigation

Where the matter will be investigated under this procedure, the recipient of the Disclosure will liaise with the person making the Disclosure to advise them:

1. the name of the designated Investigator
2. an estimate of the expected timeframe for investigations to take place
3. what contribution (if any) will be required of the person making the Disclosure to those investigations.
4. arrangements for confidentiality

- Usually, a preliminary internal investigation will first be necessary, however some Disclosures may require immediate referral to an outside body (e.g., the Police, Health and Safety Executive, National Audit Office).
- The Investigation should be finalised within 28 days from the date of disclosure or, if this is not possible, the Whistleblower will be informed about the reason for the delay and the likely date for concluding the investigation.

Step 4: Action
Based on the findings of the investigation, if wrongdoing is concluded, the appropriate corrective action will be taken. This may include disciplinary action against the wrongdoer.

- If on conclusion of the above stages the Whistleblower reasonably believes that the appropriate action has not been taken, they can issue an appeal to the Managing Director.
- This does not preclude the Whistleblower from reporting the matter to a relevant external authority.

Step 5: Review
After the investigation and subsequent action, a review of the matter will be conducted to ensure the effectiveness of the response. This involves a comprehensive evaluation of actions taken, the process followed, and the resolution reached.

The aim is to confirm that the issue is properly resolved and to detect any areas for improvement in our policy and procedure. This reflective step reinforces the learning from the incident and helps to prevent a future recurrence.

Provisions
- Investigations will be conducted as quickly as possible, having regard to the nature and complexity of the Disclosure.
- A person making a Disclosure may be accompanied at any meetings concerning the Disclosure by a friend or representative if this is preferred.
- The Company will endeavour to keep the person making a Disclosure informed about the actions that are being taken and the outcome of an investigation. The Company is however bound by the Data Protection Act and the Human Rights Act in respect of allegations relating to individuals and may not be able to disclose information.
- Where anonymous Disclosures are made, feedback cannot normally be provided.

Records
The Company will maintain a register of matters referred under this procedure. Details of the investigation and review will be documented and stored securely, accessible only to authorised personnel.

- Inclusion in this list will not amount to an acceptance that the information amounts to a Disclosure for the purposes of the Public Interest Disclosure Act 1998 or under this procedure.
- All information recorded for the purposes of this procedure will be maintained in accordance with

the Data Protection Act 1998.

Training

The Company recognises the importance of raising awareness about whistleblowing and the correct procedures to follow. Therefore, we will conduct regular training sessions for workers. These sessions are intended to familiarise them with the whistleblowing policy and procedure, the protection offered to whistleblowers, the process of reporting, and the potential consequences of misconduct. This will ensure all employees are well-equipped to detect and report any unethical behaviour, helping to maintain the integrity of our organisation.

Document Control

This policy will be periodically reviewed to align with emerging best practice. Any amendment to it and the date when the change will come into effect will be advised to employees under the usual mechanism for company policy updates.

Simon & Tom Eggar
Managing Directors, H Foster 1875 Ltd
Date: Sept 2026