

NG BAILEY GROUP

SPEAK UP POLICY (WHISTLEBLOWING)

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1. INTRODUCTION

1.1 Speak Up

The Board of NG Bailey Group (“NG Bailey”) is committed to running the organisation in the best way possible and in accordance with our values of passion, integrity and excellence.

In spite of this commitment, you may have concerns about what is happening at work or observe conduct that appears to breach the law, our values, policies or procedures.

If you observe or suspect misconduct or inappropriate behaviour, you are encouraged to **Speak Up**. By doing so, you give NG Bailey the opportunity to deal with the issue.

NG Bailey values the help of those who Speak Up about potential concerns that need to be addressed. Speaking up is encouraged and individuals who Speak Up are protected. You will not suffer for raising concerns in good faith and we do not tolerate any form of retaliation against you from Speaking Up. Speaking Up is essential for NG Bailey to sustain its reputation, success and ability to operate, both now and in the future.

The purpose of this Speak Up policy is to explain how you can raise concerns in confidence and what you can expect from NG Bailey if you Speak Up.

1.2 Who can Speak Up?

This Policy applies to:

- All persons working for the NG Bailey Group of companies (this includes but is not limited to NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited and The Freedom Group of Companies (“NG Bailey”)) or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers and interns.
- Any others who act in partnership with or on behalf of NG Bailey and whose conduct will reflect upon NG Bailey. This includes, but is not limited to former employees, job applicants, agents, contractors, external consultants, third party representatives and suppliers.

1.3 What concerns are covered by this Speak Up policy?

This policy can be used to raise concerns within NG Bailey and includes anything perceived to be illegal, unethical or unprofessional.

Examples of concerns include, but are not limited to:

- fraud;
- discrimination or harassment;
- violation of competition laws and rules;
- inadequate financial or non-financial record keeping
- conflicts of interest;
- bribery;
- environmental, health and safety issues;

- tax evasion;
- regulatory breaches;
- improper use of company resources;
- disclosure of confidential information;
- breach of NG Bailey's policy on gifts, hospitality and donations;
- non-compliance with our values, policies, procedures and/or processes; and
- wrongdoing to customers, stakeholders or employees.

This policy is not to be used:

- to report events presenting an immediate threat to life or property. If emergency assistance is needed, please contact the appropriate emergency services;
- for personal grievances such as bullying, harassment or discrimination or grievances in relation to your terms of employment. These should be reported under the Grievance or relevant HR policy);
- to settle personal disputes; or
- to make accusations you know to be false; doing so may lead to disciplinary measures.

2. HOW TO SPEAK UP

2.1 Step One

This policy does not replace regular reporting lines. If you have a concern, we hope you feel able to raise it first with your line manager. This may be done verbally or in writing.

2.2 Step Two

We understand that you may find it difficult to Speak Up using internal channels so if you feel unable to raise the matter with your manager, for whatever reason, you can report externally through NAVEX Global, which is a completely independent organisation. You can use one of the following methods:

- Call the hotline:
 - UK - Call 0800 890011, then dial 833 626 1550
 - Cyprus - Call 800 90010, then dial 833 626 1550
 - Germany - Call 0800 225 5288, then dial 833 626 1550
- Visit the website: ngbailey.ethicspoint.com
- Alternatively contact us internally via concerns@ngbailey.co.uk

2.3 External whistleblowing

NG Bailey strongly encourages you to raise concerns internally through one of our available channels. Taking a concern to an outside party (e.g., the media) can have serious implications for NG Bailey, for the persons involved and possibly, you.

By **Speaking Up** internally, you give NG Bailey the chance to look into the matter, protect your anonymity and take action if necessary.

2.4 What kind of information do you need to provide?

When raising a concern (in person, by phone or online) please provide as much detailed information as you have to enable NG Bailey to assess and investigate your concern.

This could include:

- the background, history and reason for concern;
- names, dates, places and other relevant information such as project/contract details; and/or
- any documents that may support your report.

NG Bailey encourages you to Speak Up as soon as possible before situations get out of hand or damage is done. It is always better to discuss upfront than report afterwards. Speak Up with the facts available to you, even if you do not have all the facts. You are not expected to prove that your concern is well founded. NG Bailey will investigate to determine if there is reason for concern.

All matters will be investigated but a successful resolution is more likely if there is supporting information or the real possibility of obtaining it. Never investigate the matter yourself and do not seek evidence to build a stronger case. No disciplinary or other measures will be taken against you if your genuine concern later turns out to be mistaken or misplaced.

2.5 Safeguarding your position: confidentiality and non-retaliation

All reporting is done confidentially. Your concern will only be shared with a limited number of people on a strict 'need to know' basis. Information will only be disclosed beyond this small group if NG Bailey is required to do so by law or an important public interest is at stake. You can also help protect this confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

You can Speak Up about your concerns anonymously, but NG Bailey encourages you to share your identity as it is much more difficult to investigate anonymous tip offs.

NG Bailey is committed to protecting the privacy of all persons involved. It will do all that is reasonably possible to safeguard personal data from unauthorised access or processing. Any personal data obtained as part of this Speak Up policy will only be used for the purposes explained in this policy, to comply with the law or an important public interest.

Speaking Up is encouraged and employees who Speak Up are protected. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated. Retaliation is a disciplinary matter.

However, you will not be protected if you maliciously raise a concern you know is false. Knowingly making a false accusation, lying to investigators, interfering with an investigation, or refusing to cooperate in an investigation may lead to disciplinary measures against you.

2.6 What happens after you Speak Up?

NG Bailey takes every report of possible misconduct seriously. Your report will be reviewed and where appropriate, investigated. You will be informed of the overall findings. However, we will not be able to provide full details of the outcome of a matter or related actions taken for reasons of confidentiality, privacy and the legal rights of all concerned.

All parties involved are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

2.7 Independent advice

If you are unsure whether to use this policy or you want independent advice at any stage, you may contact the independent charity Protect on **020 3117 2520** or by email at whistle@protect-advice.org.uk. Their advisers can talk you through your options and help you raise a concern.

3. DOCUMENT HISTORY

3.1 Document owner and approval

The Legal Team is the owner of this document and is responsible for ensuring that this policy is reviewed in line with all legal requirements, as well as emerging best practice.

A current version of this document is available to all members of staff on MyNGBailey. It does not contain confidential information and can be released to relevant external parties.

This Policy was approved by the Chief Financial Officer and is issued on a version controlled basis under the signature of the Chief Financial Officer.

Date: October 2022

Jonathan Stockton

Chief Financial Officer

For and on behalf of the Board of the Company

3.2 Change amendment summary

Document Amendment Summary				
This document is published as a controlled document but will be uncontrolled once downloaded or printed. The document will be reviewed periodically.				
Issue Date	Version	Author	Approved by	Details of Changes
Aug-18	1.	Lisa McDonell	Mike Porter	Policy refresh
Oct-2018	1.	Sanchia Wheeler	Mike Porter	Changing document owner
May-2019	1.2	Rob Smith	Mike Porter	Amend document title
Oct-2021	1.3	Martin Jordan/ Chris Dyson	Jonathan Stockton	Policy refresh
Oct-2022	1.4	Sarah Vause	Jonathan Stockton	Policy refresh

Issue Date	Version	Review Date	Author	Owner	Pages
Aug-18	1.0	Aug-19	Lisa McDonell	Mike Porter	6
Oct-18	1.1	Oct-19	Sanchia Wheeler	Mike Porter	6
May-19	1.2	May-20	Sanchia Wheeler	Mike Porter	6
Oct-21	1.3	Oct-22	Martin Jordan/ Chris Dyson	Jonathan Stockton	6
Oct-22	1.4	Oct-23	Sarah Vause	Jonathan Stockton	7
Review Date is 1 years from Issue Date			Retention Period is 5 years from Review Date		

CONTACT

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