

‘SPEAK UP’/WHISTLEBLOWING POLICY – 09PEO1-PY-24

Background

Whistleblowing is when an individual raises a genuine concern about suspected wrongdoing, including potentially dangerous, illegal or unethical activity in the workplace. Raising concerns helps protect people, prevent harm and maintain trust in Sir Robert McAlpine.

We are committed to maintaining an open and supportive speak up culture that reflects our values of acting responsibly and with integrity.

We understand that it can sometimes be difficult to know what to do. This policy is designed to help you raise genuine concerns at an early stage and through the appropriate channels. We encourage you to speak up when something does not feel right.

The SRM Group is committed to maintaining high standards of conduct and acting ethically, responsibly and with integrity in everything we do. We encourage anyone covered by this policy to speak up if they become aware of wrongdoing, unsafe practices, unethical behaviour or any other concern that may impact our people, business or stakeholders, known as malpractice. Raising concerns at an early stage allows them to be reviewed, investigated where appropriate, and addressed fairly and effectively.

Purpose

The purpose of this policy is to explain what whistleblowing means and how to raise a concern. We define whistleblowing as speaking up about suspected wrongdoing, malpractice or other concerns that are in the public interest. This policy explains how concerns can be raised safely, confidentially where appropriate, and without fear of victimisation, and how those concerns will be reviewed and addressed.

Who does this policy apply to?

This policy applies to all employees including but not limited to all staff and operatives directly employed by the SRM Group, regardless of age, sex, religion or faith, pregnancy or maternity, gender identity, race, sexual orientation, marriage or civil partnership, socio economic background and any other relevant characteristics.

It also applies to individuals working under the direction or control of a Sir Robert McAlpine company, including consultants, agency workers, temporary workers and those assigned to joint ventures with Sir Robert McAlpine.

The aims of this policy

Everyone covered by this policy is expected to raise concerns where they believe wrongdoing, malpractice or unsafe or unethical behaviour may have occurred. The aims of this policy are to:

- encourage employees to promptly report suspected malpractice, in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected.
- provide clear guidance as to how to raise those concerns.
- provide reassurance that genuine concerns can be raised without fear of victimisation, detriment or reprisal, even where concerns are ultimately found to be unfounded

- provide a clear procedure within the SRM Group for reporting, investigating and addressing any malpractice in the workplace, including clarifying the roles and responsibilities of those involved in reporting and investigating allegations of malpractice.

What is malpractice?

We consider malpractice to be wrongdoing, unlawful conduct, unethical behaviour, unsafe practices, or other actions that may adversely affect our people, business, stakeholders or the wider public. The following is a non-exhaustive list of examples of malpractice:

- Criminal offences
- Fraud, theft or other dishonesty
- Bribery or corruption
- Misuse of confidential information
- Not disclosing conflicts of interest
- Sexual harassment
- Breaching laws (e.g. procurement law, competition law or data protection law)
- Improper accounting or auditing practices
- Breaching SRM Group policies and procedures which may result in harm to the SRM Group
- Harm to the environment
- Serious breaches of health and safety requirements
- Modern slavery
- Concealment of malpractice
- Conduct likely to damage the reputation of the SRM Group or the McAlpine family
- Retaliation or victimisation of a person who has raised a concern
- Serious breaches of ethical standards or the Code of Conduct
- The deliberate misuse of company systems, data or information that may result in legal, financial, operational or reputational harm

How to raise a concern?

You can raise a concern regarding malpractice by telephone, in person or in writing. The ways you can raise a concern are as follows:

To report a concern internally

- To your line manager
- To SRM Group’s Whistleblowing Officer, the General Counsel, Legal & Insurance
- To your HR Business Partner
- To Culture and People Director

To report a concern externally

If you prefer to raise a concern anonymously you are encouraged to use the independent telephone reporting line provided by our independent third party, Health Assured.

The Speak Up reporting line is confidential, free to use and available 24 hours a day, 7 days a week. You can raise a concern on a named, confidential or anonymous basis. Any personal information you provide will be treated in strict confidence. Where you choose to report anonymously, no information that could identify you will be captured, including the Internet Protocol (IP) address of the computer or device used to submit your report.

Health assured – Speak-up

- Free, 24 hour confidential helpline: 0800 047 4037

We hope that you will feel able to voice concerns openly under this ‘Speak Up’ Policy. However, if you want to raise your concern confidentially, we will make all reasonable efforts to keep your identity confidential.

We encourage concerns to be raised on a named basis wherever possible, as this can help us to investigate thoroughly and seek further information where needed. Anonymous reports will still be taken seriously; however, it may be more difficult to investigate concerns fully or assess the information provided if we are unable to contact you. If you are concerned about your identity being disclosed or about potential reprisals, you can raise this with your HR Business Partner.

What will happen after I raise a concern?

The SRM Group is committed to ensuring that all concerns are handled appropriately, consistently, fairly and professionally. Once a concern is raised, all relevant information provided will be reviewed and, where appropriate, investigated thoroughly. If you choose to remain anonymous, any identifying information will be excluded from the review process. In the interests of confidentiality and fairness, you should avoid discussing the matter further once it has been reported.

If you raise a concern with your line manager, they will first consider whether it falls within the scope of this ‘Speak Up’ Policy. Where it does, the concern will be referred to your HR Business Partner. All concerns are recorded centrally and assessed to determine whether further investigation is required and, if so, who is best placed to carry it out. Any investigation will be proportionate to the nature of the concern raised.

Any further contact with you, including keeping you up to date with the progress of investigations, will depend on the circumstances, bearing in mind any duty of confidentiality owed to others. Once the investigation is complete, you will be informed of the outcome where this is feasible and appropriate.

What if I have a grievance?

The Speak Up Policy is not intended for concerns relating solely to your own personal circumstances at work. These matters should be raised and managed through the company grievance policy. If you have concerns of this nature, please speak to your HR Business Partner or the People Operations team.

However, where you are raising concerns about wrongdoing, misconduct, sexual harassment or unacceptable behaviour affecting others, the wider business or the public interest, these concerns should be reported under this Speak Up Policy.

Should I be worried about reporting a concern?

We realise that it can be hard to raise concerns. One reason people may hesitate is a fear of retaliation. However, if you raise a concern or report wrongdoing in good faith, you are doing the right thing. The SRM Group will not tolerate retaliation against anyone who raises a concern under this policy. If you believe you or another individual has been subjected to retaliation for raising a concern, you should report this to your HR Business Partner as soon as possible. Anyone found to

have retaliated against an individual for raising a concern in good faith may be subject to disciplinary action, up to and including dismissal.

Concerns or allegations raised in bad faith, including where an individual knowingly provides false information, will not be tolerated and may also result in disciplinary action.

We also understand that people may sometimes feel concerned that raising an issue will not lead to action being taken. However, all concerns raised in good faith will be taken seriously and reviewed appropriately. Where concerns require investigation, we will take reasonable steps to establish the facts and respond accordingly. If misconduct is identified, appropriate corrective action will be taken, including disciplinary action where necessary, regardless of the seniority of those involved.

Speaking Up means raising a genuine concern, in good faith, about suspected wrongdoing, malpractice or danger relating to our activities. If you have a Speak Up concern, you should report it under this policy.

Protection and support

This Speak Up Policy is designed to support individuals to raise genuine concerns and goes beyond the minimum requirements of the Public Interest Disclosure Act 1998 (PIDA). PIDA provides legal protection in certain circumstances for workers who raise qualifying whistleblowing concerns in the public interest.

PIDA provides protection for workers in certain circumstances where they are treated unfairly, disadvantaged or dismissed because they have made a protected whistleblowing disclosure.

A disclosure may be protected where the worker reasonably believes it is in the public interest. This may include a criminal offence, failure to comply with any legal obligation, miscarriage of justice, dangers to health or safety, damage to the environment, sexual harassment or the deliberate concealment of any of these matters.

To qualify for protection, the worker must reasonably believe that the information disclosed is substantially true and must make the disclosure to an appropriate person or body. This may include their employer, a legal adviser, a Minister of the Crown, a prescribed person under PIDA, or another person or body where the relevant legal conditions are met, including that the disclosure is not made for personal gain.

If you would like more information about whistleblowing protections and your legal rights, please refer to the Public Interest Disclosure Act 1998 or seek confidential advice from Protect, the independent whistleblowing charity. Contact details for Protect are provided later in this policy.

The SRM Group will not tolerate threats, retaliation or victimisation against anyone who raises a concern under this policy. Any individual found to have engaged in such conduct may be subject to disciplinary action. If you believe you have been subjected to, or witnessed, this type of behaviour, you should report it to your line manager or raise it under this Speak Up Policy.

The potential consequences of raising a concern

The SRM Group takes concerns of wrongdoing seriously. Where an investigation identifies evidence of wrongdoing by an employee, supplier or subcontractor, appropriate action will be taken. For employees, this may include the commencement of formal disciplinary proceedings and, where wrongdoing is substantiated, may result in disciplinary action up to and including dismissal. The SRM Group may also seek to recover losses incurred as a result of wrongdoing. Where criminal activity is suspected or identified, the matter may be referred to the relevant authorities.

Protect Whistleblowing Charity

If you would like independent support or advice about whistleblowing, you can contact Protect, the independent whistleblowing charity. Protect provides free, confidential advice and support. Any discussions you have with Protect will remain confidential and will not be shared with the SRM Group. Contact details for Protect are set out below.

Phone: 0203 117 2520

Website: <https://protect-advice.org.uk/>

We encourage concerns to be raised through the internal reporting channels set out in this policy wherever possible. This gives us the best opportunity to review concerns promptly, investigate where appropriate and take action.

There may be circumstances where it is appropriate to raise a concern with an external body, such as a regulator. The law provides protections for certain external disclosures, and we strongly encourage you to seek independent advice before reporting a concern outside of the SRM Group.

Some whistleblowing concerns may relate to the actions of a third party, such as a supplier, subcontractor or business partner. In certain circumstances, the law may protect disclosures made directly to a third party or external body. However, wherever appropriate, we encourage concerns to be raised internally first in accordance with this policy.

Monitoring and review

The General Counsel, Legal & Insurance and the People and Culture Director are responsible for reviewing the implementation, effectiveness and ongoing suitability of this policy. The policy will be reviewed annually and updated where necessary to ensure it remains current, effective and aligned with legal and business requirements

Title:	‘Speak Up’/ Whistleblowing Policy		
Owner:	Drew Norman	Version:	6
Approved by :	Peter Leonard, Chief Commercial Officer		
Date of last review:	July 2026	Date of next review:	July 2027