

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 by our values of passion, integrity, responsibility and excellence.

Despite 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.

You are encouraged to speak up if you observe or suspect misconduct or inappropriate behaviour. By doing so, you allow NG Bailey 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 genuine concerns, and we do not tolerate any form of retaliation against you for Speaking Up. Speaking Up is essential for NG Bailey to sustain its reputation, success and ability to operate now and in the future.

This Speak Up policy explains 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;
- [anti-slavery and human trafficking](#) (2023 modern slavery statement);
- environmental, health and safety issues;
- tax evasion;
- criminal facilitation of tax evasion ([CCO policy](#));
- 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, discrimination, or grievances concerning your terms of employment. These should be reported under the Grievance Guidance 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

You are encouraged to report concerns to your line manager in the first instance. However, if you feel uncomfortable doing so or believe your line manager is involved in the wrongdoing, you can report the matter to a more senior manager or even directly to the Board of Directors.

2.2 Step Two

We understand that you may find it challenging to Speak Up using internal channels, so if you feel unable to raise the matter internally, for whatever reason, you can report externally through NAVEX Global, which is an entirely 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 severe implications for NG Bailey, the persons involved and possibly you.

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

2.4 What kind of information do you need to provide?

We hope you will raise your concern openly. When raising a concern (in person, by phone or online), please provide as much detailed information as possible 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 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.

We recognise that there may be circumstances when you prefer to speak to someone confidentially. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that sometimes, we cannot resolve a concern without revealing your identity, for example, where your personal evidence is essential. In such cases, we will discuss whether and how the matter can best proceed.

Please remember that if you do not tell us who you are (and therefore, you are raising a concern anonymously), it will be much more difficult for us to look into the matter. We will not be able to protect your position or give you feedback. Accordingly, you should not assume we can provide the assurances we offer similarly if you report a concern anonymously.

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 genuine concerns 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 to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

We have a zero-tolerance approach to the victimisation of anyone who Speaks Up and treat victimisation as a disciplinary matter. If you experience reprisal, harassment, or victimisation for raising a genuine concern, please refer to the NG Bailey Grievance Guide. Examples could include:

- Attempting to identify the whistleblower.

- Demoting the whistleblower.
- Reducing the whistleblower's pay or benefits.
- Changing the whistleblower's job duties or responsibilities detrimentally.
- Giving the whistleblower negative performance reviews.
- Disciplining or firing the whistleblower without cause.
- Making the whistleblower's work environment hostile or intimidating.
- Threatening or retaliating against the whistleblower in any way.

2.7 Independent advice

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

3. DOCUMENT HISTORY

3.1 Document owner and approval

The Audit and Assurance Team owns this document and is responsible for ensuring that this policy is reviewed in line with all legal requirements and emerging best practices.

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

This Policy was approved by the Group Finance Director and is issued on a version-controlled basis.

Date: October 2023

Clare Salmon

Group Finance Director

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 |
| Oct-2023 | 1.5 | Sarah Vause | Clare Salmon | Policy refresh |
| Review Date is one year from Issue Date | | | Retention Period is five years from the Review Date | |

CONTACT

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