

Whistleblowing Policy Statement

Policy Statement

The Board of PDR Construction Limited is committed to a free and open culture in dealings between its managers, employees, workers, customers, suppliers, and all people with whom the Company engages in business relations.

The Board recognises that effective and honest communication is essential to maintain our business values and to ensure that instances of business malpractice are detected and effectively dealt with.

Purpose

The purpose of this policy is to provide guidance and encourage all those who work with or within the company, who feel they need to raise certain issues or concerns relating to business misconduct, can do so in confidence.

Application

This policy will apply in cases where anyone who in the public interest raises concerns, and in good faith believe that business misconduct, has occurred or may occur within PDR. Anyone raising concerns, will not under any circumstances be subjected to any form of detriment or disadvantage as a result of, having raised their concerns.

What constitutes Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally) a breach of a legal Statutory or Regulatory requirement or unethical, immoral behaviour, and it is in the interest of the public to raise it, this may include:

- criminal activity e.g. types of financial impropriety, such as fraud
- a person not complying with any legal obligation
- instances of slavery, servitude, forced and compulsory labour and human trafficking in PDR or anywhere within its supply chain
- the use of deception to obtain an unjust or illegal financial advantage for the business unit or personally
- a miscarriage of justice
- endangering the health and safety of an individual
- damage to the environment has been, is being or is likely to be damaged
- deliberate concealment of information relating to any of the above

This policy is separate from the grievance procedure as described within the Staff Handbook. It does not form part of any employee's contract of employment, and it will be publicised and made readily available in Union Square, for all employees, to access.

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Procedure

1. Individuals wishing to raise a concern does not need to prove the breach or failure that they are alleging has occurred or is likely to occur; a reasonable suspicion will suffice, i.e. where the individual reasonably believes that the information disclosed is substantially true.
2. If an individual wishes to raise or discuss any issues which might fall into one of the categories listed in this policy, they should contact the Managing Director, or in his absence the Human Resources Manager. This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the employee who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the individuals working relationships are not prejudiced by the fact of the disclosure.
3. Anyone raising a concern should be aware that the policy will apply where they reasonably believe that the information disclosed, and any allegation contained in it are substantially true. If any disclosure concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the company's disciplinary policy and procedures and may constitute gross misconduct for which summary dismissal maybe an outcome.
4. While we hope that such disclosures will never be necessary, we recognise that we may find circumstances which are new to it, therefore, each case will be treated on its own merits.
5. Anyone who makes a disclosure is protected from detrimental treatment by the company, by a colleague or by an agent of the business. An employer is vicariously liable for detrimental treatment. If this occurs, it should be raised immediately with the line manager so that the matter can be investigated thoroughly without undue delay. Detrimental treatment includes, for example, harassment and bullying or not complying with a person's rights and entitlements under his or her contract of employment.
6. An employee is also protected from dismissal by the company for making a protected disclosure.

The policy will be reviewed on a regular basis to be updated or revalidated as appropriate.

Approved: *P. Dransfield*
Paul Dransfield [Managing Director]

Date: 19 . 3 . 21