



BRISCOE GROUP LIMITED

SPEAK UP POLICY

Principle

Briscoe Group is committed to ensuring that all its employees act in good faith, comply with laws, regulations and company policies. To protect a supportive work- relationship environment, the Speak Up policy describes how inappropriate or unlawful conduct can be raised by employees without fear of negative consequences for the person who is reporting their concerns.

Scope

This policy applies to Briscoe Group's current and past employees.

This policy does not replace raising or reporting of issues, concerns or complaints either informally or formally through the normal management process. i.e. with a team member's immediate or more senior managers as appropriate. All employees are encouraged "if you see something wrong, speak up". We advise employees to:

- "Talk to their manager if they're comfortable discussing the concern with them, or
- Contact a member of the HR Team if they're not comfortable raising it with their manager, or
- Call the Speak Up Hotline on 0800 847 633 if they're not comfortable with either of the above".

The Speak-Up Hotline is an additional tool available to all employees of Briscoe Group to raise serious concerns when the normal escalation process does not feel safe or has proven to be ineffective. All issues are taken seriously, investigated and a resolution sought in good faith and following fair process.

Speak-Up Hotline

Briscoe Group has enlisted the support of Incident Response as an independent service provider. Employees can confidentially report issues by calling the Speak-Up hotline administered by Incident Response on 0800 847 633. When they call, they are given the option to remain anonymous to both Incident Response and Briscoe Group.

Reporting, Investigation and Follow-up

Once the details have been reported through the Speak-Up hotline, an initial notification email from Incident Response is sent to the Chief Financial Officer (CFO), Chief People Officer (CPO) or other appointed authorities at Briscoe Group. For matters relating to corruption, fraud, or other financial impropriety the CFO will progress the matter. Matters relating to inappropriate behaviour, conduct or similar will be progressed by the CPO.

The CFO, CPO or other appointed authorities will ensure a full investigation into the matter is carried out and the appropriate action taken. This may involve internal and / or external investigators depending on the expertise required and seriousness of the situation.

Types of Matters to Report

The types of concerns that can be reported include examples of:

- Corruption
- Fraud
- A serious breach of company policy or procedure
- Unethical conduct
- Dishonesty
- Anticompetitive market behaviour
- Illegal acts, including theft or other criminal activity
- Inappropriate behaviour including bullying or harassment

Reporting a matter in Good Faith

When an employee reports a matter in good faith (as long as they are not responsible for the matter reported), then they will not be penalised nor personally disadvantaged by reporting the matter in relation to any of the following:

- Disciplinary proceedings
- Any form of harassment, discrimination or bias.

Any employee or manager who is found to have disadvantaged an employee as a result of him or her “speaking up” may be subject to disciplinary action.

Disclosure Protection

An employee acting in good faith and reporting serious wrongdoing will be protected by the Protected Disclosures (Protection of Whistleblowers) Act 2022.

The Act states disclosure will be protected if:

- the information is about serious wrongdoing in or by their workplace
- the complainant reasonably believes the information is true.

Their disclosure will not be protected if:

- they know the allegations are false
- they act in bad faith
- the information they are disclosing is protected by legal professional privilege.

Consequences of not acting in Good Faith or False Reporting

Where it is established the employee did not act in good faith, or knowingly made a false report they may be subject to disciplinary proceedings in accordance with Briscoe Group policies.

Review

The policy will be reviewed on an annual basis.

Responsibility: Chief People Officer

Approved: July 2024

Next review: July 2025