

## Whistle-blowing policy

### Introduction

Nexus Infrastructure plc is a leading provider of essential infrastructure services to the UK house building and commercial sectors.

The aim of this policy is to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, as appropriate, and that their confidentiality will be respected.

The purpose of this paper is to:

- Provide staff with guidance as to how to raise those concerns
- Reassure staff that they can raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

This policy applies to all individuals, working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff.

You are encouraged to use the procedure set out below in good faith if you have any concerns about actual or suspected wrongdoing at work concerning any actual, or suspected, irregularity, malpractice, breach or misconduct of a general, environmental, operational or financial nature within a Group company based on reasonable grounds, including concerns that may be viewed as a breach of our Company values, is a reportable incident, including but not limited to:

- Accounting, internal accounting controls or auditing matters;
- Bribery or corruption;
- Deceit;
- Environmental damage;
- Fraud or theft;
- Health hazards;
- Infringements of local law or secondary legislation;
- Insider trading;
- Market abuse;
- Money laundering;
- Security risks;
- Conflict of interest; and
- Sexual harassment.



Concerns for which specific procedures have been established or personal grievances of employees are excluded from the scope of this Policy.

## **Confidential reporting**

Our intention is that staff will feel able to voice concerns openly under this policy and we will support staff that raise genuine concerns in good faith under this policy, even if they turn out to be mistaken. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith when they are made anonymously.

However, if you want to raise your concern confidentially, we will ensure your identity is kept confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the Group reserves the right to make such a referral without your knowledge and consent.

## **External reporting**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that, in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely – if ever – be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistle-blowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact the Group HR Director for guidance.

## **Reporting concerns**

If appropriate, discuss the matter with your line manager and Group HR Director in the first instance. They may be able to resolve your concern quickly and effectively. In some cases they may refer the matter to the Company Secretary. However, where the matter is more serious or you feel that your line manager and the HR Director have not addressed your concern, you should contact the Managing Director of your company. If you prefer not to raise the matter with them for any reason (including if you suspect that one of them is involved or implicated in any way), please discuss the matter with the Company Secretary who can be contacted on 01376 320856 or [companysecretary@nexus-infrastructure.com](mailto:companysecretary@nexus-infrastructure.com).

## **Investigation procedure**

We will aim to give you an indication of how we propose to deal with the matter. You may be required to attend additional meetings or to provide further information. If the matter requires further investigation, such an investigation will be carried out and we aim to give you an indication of the outcome of the investigation and what, if any, action has been taken. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any action taken as a result. You must treat any information about any investigation as confidential.

We will deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this. If you are not satisfied with the response of your line manager or the Group HR Director or Managing Director of your company, or the Company Secretary and/or the outcome of the investigation, you should contact the Chief Executive.

## **No reprisal**

If you are concerned about reprisals if your identity is revealed, you should raise the matter with the Company Secretary.

The Group will not subject any employee who makes a disclosure in good faith under this Policy to any detriment (including dismissal, disciplinary action, threats or other unfavourable treatment).

In the event that you believe you are being subjected to negative, threatening or retaliatory treatment by any person within the Group as a result of your decision to invoke the procedure you must inform the Company Secretary or the Group HR Director immediately and appropriate action will be taken to protect you from any reprisals. Anyone involved in such conduct against you will be subject to disciplinary action.

## **Disciplinary action**

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work.

If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons, for self-advancement or to pursue a personal grudge against another, this will constitute misconduct and will be dealt with in accordance with the terms of the disciplinary procedure.

## **Further advice and guidance**

In the event that you are unsure whether you should raise an issue under this policy, or you need advice as to how to do so, free confidential advice is available from Public Concern at Work (telephone +44 (0)20 7404 6609 or email [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk)). Public Concern at Work is a charity with the objective of promoting compliance with the law and good practice.

# NEXUS

Essential infrastructure services

01376 320 856  
info@nexus-infrastructure.com  
www.nexus-infrastructure.com

For and on behalf of Nexus Infrastructure plc.

Signed:

A handwritten signature in black ink, appearing to be 'M. Morris', with a small dot at the end.

**Mike Morris**  
**Chief Executive Officer**