



# **Nexus Infrastructure plc**

Policy

Whistleblowing

# NEXUS

## Whistleblowing Policy

### Background

Nexus Infrastructure plc (including its subsidiaries), referred to in this statement as “Nexus” is committed to conducting our business with honesty and integrity.

Whistleblowing is the reporting of suspected wrongdoing or malpractice which you may uncover during your work, and the law provides protection for employees who raise legitimate concerns.

Examples of reportable incidents include but are not limited to; bribery or corruption, fraud or theft, health and safety hazards, environmental damage, accounting, internal accounting controls or auditing matters and any breach of legal or professional obligations.

You are encouraged to report suspected wrongdoing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated.

### Scope

This policy applies to all employees of Nexus. Other individuals performing functions in relation to Nexus, such as agency workers and contractors, are encouraged to use it.

This policy does not form part of any employee's contract of employment and we may change it from time to time.

### Nexus Policy

- **How to raise a concern**

If appropriate, discuss the matter with your line manager in the first instance. They may be able to resolve your concern quickly and effectively. However, where you believe that you cannot raise it with your line manager, you should contact either your Managing Director, the Director of People or the Group CEO.

- **Confidentiality**

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.

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary, we reserve the right to make such a referral without your knowledge and consent, but we will inform you as soon as appropriate and practicable.

- **External reporting**

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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. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity 'Protect' 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 employees, but they may sometimes relate to the actions of a third party, such as a client, 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 Director of People for guidance.

- **Investigation Procedure**

You may be required to attend additional meetings or to provide further information. An investigation will be carried out if the matter requires further investigation, and we will aim to give you an indication of the outcome 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 all information about any investigation as confidential.

- **Protection and Support for Whistleblowers**

We encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

If you believe you are being subjected to detrimental treatment as a result of raising your concern, you must inform the Director of People immediately and appropriate action will be taken.

- **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 'Protect' their advice line is available on 0203 117 2520. 'Protect' is a registered charity which aims to make whistleblowing work for individuals, organisations and society.

## Approval

This policy has been approved by the Board of Directors who will review and update it periodically.