

Whistleblower Policy

Introduction

'Whistleblowing' is a term used to refer to the disclosure by employees of malpractice – internally or externally – as well as illegal acts, or omissions at work.

Raising concerns about wrongdoing can be one of the most difficult and challenging things to do in a work environment. Under this policy you may come forward with legitimate concerns without fear of being blamed or suffering any disadvantage for doing so.

Clancy Group Holdings Limited (Clancy or We) is committed to maintaining an open culture with the highest standards of honesty and accountability, where staff can report as soon as possible any legitimate concerns in confidence in every area of its operation. This policy reflects the legal protection given to staff under the UK Public Interest Disclosure Act 1998.

What Types of Concerns Can be Raised by Whistleblowers

The Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who reasonably believe that they are acting in the public interest and where the disclosure falls into one or more of the following categories:

- A criminal offence that has, is being, or is likely to be committed
- Unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and/or sensitive information
- A miscarriage of justice
- A danger to the health and safety of employees or others
- Attempts to suppress or hide information relating to wrongdoing.

This Whistleblowing Policy is intended to allow concerns that relate to suspected wrongdoing or danger at work to be reported if they are reasonably believed to be in the public interest.

As long as you hold a reasonable belief that the information is true, then you will be covered by the protection set out in this policy regardless of whether you are mistaken, or the matter cannot be proved.

Whistleblowing does not cover concerns where there is no public interest element such as a concern about your own employment or related matters. To raise a concern in relation to this please refer to Clancy's Grievance Procedure.

The Policy

We encourage you or others with concerns, particularly relating to financial, governance or regulatory matters, to come forward and express those concerns.

We appreciate that you will sometimes feel worried about possible repercussions. We have a responsibility to ensure that any alleged wrongdoings are fully investigated and that, where appropriate, feedback is provided to you (as the individual who has raised the concern).

No action will be taken against you provided the allegation is made in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by our investigation. No one should threaten or retaliate against a whistleblower in any way and if you believe you have suffered such treatment you should inform us immediately and, if the matter is not remedied, then you may raise that matter via our **Grievance Procedure**.

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.

If something is troubling you, that you think we should know about or look into, please let us know. If, however, you are aggrieved about your personal situation, please refer to our **Grievance Procedure**.

Our Procedure – Notification of Improper Conduct

If you believe that Clancy or an individual has acted or may be acting improperly, you are encouraged to report these concerns. You can raise issues through our independently run whistleblowing service: **SeeHearSpeakUp**.

Concerns can be reported through one of the **SeeHearSpeakUp** channels, including live telephone reporting, secure web portal or email, which are accessible 24 hours a day, 365 days a year. We will endeavour to maintain confidentiality in respect of all concerns raised and reports can be made anonymously if preferred. **SeeHearSpeakUp** will then pass your concern onto the Chairman of the Audit and Risk Committee for investigation.

How it works

You can raise concerns to **SeeHearSpeakUp** by any of the following channels:

BY PHONE: Call **0800 988 6818**. This confidential reporting hotline operates 365 days per year, 24 hours per day. All handlers are professionally trained.

ONLINE PORTAL: You can report online via the website at www.seehearspeakup.co.uk/en/file-a-report. You will need a username and password to login. These are as follows:

USERNAME: Clancy

PASSWORD: C6429

BY EMAIL: You can email any concerns to SeeHearSpeakUp at report@seehearspeakup.co.uk. When emailing please state Clancy in the subject header.

Procedure for Investigation

Once you have raised a concern, we will carry out an initial assessment to determine the scope of the investigation. We will then acknowledge receipt of your complaint.

Whether or not there was a case to answer and provided that your disclosure was made in good faith because you reasonably believed it to be true, your manager, or senior management, will ensure that you are protected from reprisal or victimisation as a result of your complaint. If, however, your allegations were false, made maliciously or with a view to a personal gain, we may take disciplinary action against you, up to and including dismissal.

Confidentiality of Disclosures

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, Clancy will treat all disclosures in a confidential and sensitive manner. As part of this, the identify of any member of staff making an allegation will be kept confidential so long as it goes not hinder any investigation.

If it becomes clear that we are unable to resolve the issue without revealing your identity, we will discuss this with you, taking into account your views and our wider legal obligations before deciding whether or not to proceed with the investigation.

Reporting of Outcomes

We will aim to provide you with feedback where possible. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or of any action taken as a result. We cannot guarantee the outcome you are seeking, but we will deal with your concern fairly and in an appropriate way.

All

We cannot guarantee the outcome you are seeking, but we will deal with your concern fairly and in an appropriate way.

Advice for Staff Raising a Concern

Clancy acknowledges the difficult choice a member of staff may have to make in raising a concern. As the issues that prompt the concern are likely to be complex, how the member of staff proceeds with his or her concern will vary from situation to situation. The following advice is recommended if a member of staff wishes to make a disclosure:

- Make any objections to illegal, unsafe or unethical practices promptly so as to avoid any misinterpretation of the motives for doing so;
- Focus on the issues and proceed in a tactful manner to avoid unnecessary personal antagonism which might distract attention from solving the problem;
- Be accurate in his/her observations and claims and keep formal records documenting relevant events.

Members of staff may also wish to seek independent legal advice.