
Whistleblowing Policy

May 2026

Version No	Date Issued	Update Details	Owner	Approved By	Policy Number
v3.0	January 2022	Policy in previous format.	Company Secretary	The Board	CG1-POL-009
v4.0	December 2022	Policy finalised following major revision and review of February 2022 policy, amendments and change of format.	Company Secretary	The Board	CG1-POL-009
v4.1	January 2024	Review of policy.	Company Secretary	The Board	POL-009
v4.2	January 2025	Annual review of policy. Changes made to name of Whistleblowing Provider.	Company Secretary	The Board	POL-009
v4.3	May 2026	Annual review of policy with amendments made.	Company Secretary	The Board	POL-009

Whistleblowing Policy

Clancy Group Holdings Limited and its subsidiaries (Clancy, our, or we) are committed to maintaining high standards of conduct across our workforce, including employees, consultants, contractors, and agency workers. However, things can go wrong from time to time, or illegal or unethical conduct may occur. This policy sets out how concerns can be raised and addressed.

We want to encourage you to report suspected wrongdoings as soon as possible, in the knowledge that your concerns will be taken seriously and investigated appropriately. We will respect your confidentiality will be respected and you can request anonymity when raising concerns.

Policy

The purpose of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. We encourage anyone with concerns, particularly relating to financial, governance or regulatory matters, to come forward and raise them. This policy sets out how to raise a concern and how we will respond.

If something is troubling you that you think we should know about or investigate, please raise it as soon as possible.

If you reasonably believe that the information you are reporting is true, you will be covered by the protections set out in this policy even if you are mistaken, or the matter cannot be proved. If, however, you are aggrieved about your personal situation, please refer to our Grievance Policy.

A concern may relate to your personal treatment but also indicate wider wrongdoing affecting others or the business. If you are unsure which route to use, raise the issue and we will decide whether it should be handled under this policy, the grievance procedure, or both.

This policy is reviewed annually by the Company Secretary and will be monitored for compliance by Line Managers/Supervisors within their own area of responsibility and routine audits will be carried out annually. If you have any questions or concerns at any time around any matters covered, or possibly covered, by this policy, speak to your manager or if you prefer, to the Company Secretary (in confidence).

The Audit & Risk Committee of Clancy Group Holdings Limited has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised.

This policy does not form part of any contract of employment, and we may amend it at any time.

Who must comply with this policy?

This policy applies to all employees working for Clancy at all levels and also applies to consultants, seconded employees, agency workers, agents, or any other person associated with Clancy, (referred to as “you” in this policy).

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities, internally or externally as well as illegal acts or omissions at work. **This includes bribery, facilitation**



of tax evasion, fraud or other criminal activity, miscarriages of justice, breach of health and safety disciplines, damage to the environment and any breach of legal or professional obligations.

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 concerns where you honestly and reasonably believe that the information is true, without fear of being blamed or suffering any disadvantage for doing so.

This policy should not be used for any complaints relating to your own employment matters or any grievance issues that should be raised under our Grievance Policy found on One Clancy.

What types of concerns can be raised?

The Public Interest Disclosure Act 1998 (“**PIDA**”) provides legal protection to you if you reasonably believe that the information you disclose or the allegations that you make are substantially true. PIDA also extends protection given to Health and Safety representatives and to individuals who raise genuine concerns about health and safety and other risks.

If you believe that Clancy or an individual has acted or may be acting improperly, you are encouraged to report these concerns, some of which may include an actual or potential:

- Criminal offence that has, is being, or is likely to be committed;
- Bribery, corruption, money laundering or fraud;
- Non-compliance with a legal obligation;
- Sexual harassment;
- Unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and/or sensitive information;
- Miscarriage of justice;
- Damage to the environment;
- Danger to the health and safety of employees or others; and
- Deliberate concealment of any of the above.

We appreciate that you will sometimes feel worried about possible repercussions. We have a responsibility to ensure that 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 that you reasonably believe the allegation to be true and in public interest, even if the allegation is not subsequently confirmed by our investigation.

How to raise your concerns

You can raise issues through our independently run whistleblowing service: **AAB People** (formerly known as **SeeHearSpeakUp**), details of which are below.

AAB People whistleblowing reporting service

Concerns can be reported through one of the **AAB People** reporting channels, including live telephone reporting, secure web portal or email, which are accessible 24 hours a day, 365 days a year. We will endeavor to maintain confidentiality in respect of all concerns raised and reports can be made anonymously if preferred.

How does the Whistleblowing service work?

1. Report your workplace concerns to **AAB People** using the contact details below;
2. **AAB People** will issue you with a unique reference that allows you to get back in touch with them, update your report, or respond to information requests from Clancy— even if you have reported anonymously;
3. **AAB People** will pass the details of your report to Clancy for investigation (anonymously if you prefer).

You can raise concerns to **AAB People (formerly known as 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/login. 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 AAB People at report@aabpeople.global. When emailing please state Clancy in the subject header.

When reporting your disclosure you should:

- provide the nature of your concern, why you believe it to be true, the background and history of the concern (providing relevant dates);
- make any objections to illegal, unsafe or unethical practices at the earliest opportunity to avoid any misunderstanding of the motives for doing so;
- focus on the issues and report the issues in a clear and concise manner; and
- be accurate in your observations and keep formal records documenting relevant events.

Procedure for Investigation

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

Whether or not there is a case to answer and provided that you reasonably believe your disclosure to be true, we will ensure that you are protected from reprisal or victimisation because 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 in accordance with the Disciplinary Policy.

Confidentiality of disclosures

We hope that you will feel able to voice whistleblowing concerns openly under this policy. We will treat all disclosures in a confidential and sensitive manner. If you request anonymity, please be aware that this may limit our ability to investigate and provide feedback.

We will handle information gathered under this policy in line with applicable data protection requirements. Records of whistleblowing reports and investigations will be kept securely, with access limited to those who need it for the purposes of receiving, investigating and responding



to the disclosure.

During discussions or investigation, we may need to involve other departments (e.g., Security, Legal, or HR) and/or progress the matter under other procedures (such as the Disciplinary or Grievance procedure). Any sharing of information will be limited to those who need to know, and confidentiality will be maintained as far as possible. In some circumstances we may need to disclose information (for example, to comply with legal obligations or to conduct a fair investigation), but we will do so only where necessary.

Response

We aim, where reasonably practicable, to acknowledge anything that you raise within seven (7) days of raising it.

We will aim to provide you with feedback where possible. Sometimes, however, confidentiality requirements may prevent us from sharing specific details of the investigation or any action taken. We cannot guarantee the outcome you are seeking, but we will deal with your concern fairly and in an appropriate way.

We aim, where reasonably practicable, to provide you with a response within three (3) months of receipt of your concerns. For the purpose of this policy, a “response” may include an update on progress and/or our conclusions (as appropriate), and may not include full details if confidentiality obligations apply. Where we are able to do so, we will provide updates sooner.

If we require longer than three (3) months, we will aim to let you know within that initial three (3) month period and provide further updates as the matter progresses.

What if you are not satisfied?

If, after raising the matter through one of the channels listed, you feel that your concerns have not been sufficiently addressed, you may contact the Chairman of the Audit & Risk Committee using the following email address: whistleblower@theclancygroup.co.uk.

Protection of the Whistleblower

We encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment because of whistleblowing in accordance with this policy.

If you believe that you have suffered any such treatment you should inform your manager or the Company Secretary immediately. If the matter is not resolved and you are an employee, you should raise the matter formally using our Grievance Policy found on One Clancy.