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# Clancy Whistleblowing Policy

## December 2022

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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

## Whistleblowing Policy

Clancy Group Holdings Limited and its subsidiaries (Clancy or we) trust that you and your fellow employees, consultants, contractors, and agency workers will always want to meet the high standards of conduct that we expect from our team. All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. This policy aims to assist all of us against the harm that risk can cause.

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. 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. In most cases, you should not find it necessary to alert anyone externally. We encourage you or others with concerns, particularly relating to financial, governance or regulatory matters, to come forward and express those concerns.

You will find all the key points that we adhere to in this policy, as well as the procedure to follow if you wish to raise a concern under this policy.

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

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).

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.**

Revision 3 | CG1-POL-003 | Jan 2022

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.

**It is important to note that 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.**

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.

### 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
- 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 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 that you reasonably believe the allegation to be true and in the 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: **SeeHearSpeakUp** details of which are below.

### SeeHearSpeakUp reporting service

Concerns can be reported through one of the **SeeHearSpeakUp** 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 service work?

1. Report your workplace concerns to **SeeHearSpeakUp** using the contact details as follows;
2. **SeeHearSpeakUp** 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. **SeeHearSpeakUp** will pass the details of your report to Clancy for investigation (anonymously if you prefer).

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](http://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](mailto:report@seehearspeakup.co.uk). 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 so as 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 a 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 was 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. **Clancy will treat all disclosures in a confidential and sensitive manner.**

During discussions or investigation, it may become apparent that other departments should be



consulted, e.g., Security, Legal or HR. It may also become appropriate to progress the matter through other existing procedures (such as the Disciplinary or Grievance procedure). In all cases we will apply discretion in extending confidentiality to appropriate persons.

### Response

We shall ensure that you receive an acknowledgment for anything that you raise within seven (7) days of raising it.

We will aim to provide you with feedback where possible. Sometimes, however 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.

We shall provide a response within three (3) months and if we require a further three (3) months to respond we shall confirm that within three (3) months of receipt of your concerns. If we are able to complete our investigation earlier than we shall provide you with a response earlier.

### What if you are not satisfied?

If, after raising the matter through one of the channels listed, you feel 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](mailto:whistleblower@theclancygroup.co.uk)

### Protection of the Whistleblower

Clancy seeks to 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 remedied and you are an employee, you should raise the matter formally using our Grievance Policy found on One Clancy. Our Whistleblowing Policy is designed to allow you to raise concerns if that is the route with which you feel most comfortable.