Whistleblowing Policy

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing. This includes concerns relating to compliance with the Building Safety Act and associated regulations.

Qualifying disclosures

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a "relevant failure" by:

- committing a criminal offence.
- failing to comply with a legal obligation, including those under the Building Safety Act.
- a miscarriage of justice.
- Endangering the health and safety of an individual, including breaches of building safety requirements (e.g., defective building work, use of non-compliant products, incomplete compartmentation, inadequate fire precautions).
- Environmental damage.
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

Employees must reasonably believe that the disclosure is "in the public interest". We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Company's grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

Building Safety: Whistleblowing and Reporting Arrangements

BSA Purpose

To ensure compliance with the Building Safety Act and associated regulations, the Company has established clear arrangements for reporting any breaches of relevant requirements or concerns regarding building safety. This includes coordination with the Principal Contractor (PC), Principal Designer, and other duty holders.

BSA- Scope

This section applies to all employees, contractors, and stakeholders who become aware of, or suspect, any of the following:

- Defective building work or systems
- Use of non-compliant products or materials
- Incomplete compartmentation
- Inadequate fire safety measures or precautions
- Any other breach of building safety regulations or requirements

BSA - Reporting Pathways

1. Internal Reporting
   - Concerns should be reported in the first instance to your immediate manager or the Compliance Manager (compliance@erith.com).

- Where the concern relates to your immediate manager, or it is not appropriate to report to them, the report should be made directly to the Compliance Manager.

2. Escalation to the Principal Contractor
   - The Compliance Manager is responsible for promptly escalating all relevant building safety concerns to the Principal Contractor (PC), as well as the Principal Designer and Principal Accountable Person where appropriate.
   - All escalations must be documented, including the nature of the concern, the date of reporting, and any actions taken.
   - Where agreed with the Principal Contractor, joint reporting forms or digital platforms may be used to ensure transparency and traceability.
3. External Reporting
   - For Health & Safety concerns, anonymous reports can be made to CIRAS on 0800 4 101 101 or via www.ciras.org.uk, quoting company registration 1102060.

BSA - Behavioural Safety Reporting Channels

The Company operates behavioural safety programmes and encourages all employees, contractors, and stakeholders to report concerns related to building safety through the following channels:

- Toolbox talks
- Safety observation cards
- Digital reporting tools
- Direct communication with the Compliance Manager

All reports relating to building safety are reviewed and, where relevant, escalated to the Principal Contractor in accordance with this policy.

BSA - Confidentiality and Record-Keeping

- All reports and subsequent communications with the Principal Contractor and other duty holders will be handled confidentially.
- Records of disclosures, actions taken, and communications will be maintained securely and made available for audit as required.

Protection for Reporters

All individuals who report concerns in good faith are protected from detrimental treatment in line with the Public Interest Disclosure Act 1998 and this policy. Bullying, harassment, or any other detrimental treatment of a colleague who has made a qualifying disclosure is unacceptable and will result in disciplinary action.

The procedure

In the first instance you should report any concerns you may have to your immediate manager or the Erith Group Compliance Manager, email: compliance@erith.com, where the concern relates to the immediate manager, or it is not appropriate to make the report to your immediate manager. All concerns reported will be treated in the utmost confidence. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

For Health & Safety concerns you may also report these anonymously to CIRAS on 0800 4 101 101 or via their website at www.ciras.org.uk, quoting our company registration 1102060.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness

statements.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

Formal action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against detrimental treatment

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment, or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Signed for and on behalf of the Executive Board



Steven Darsey
Chairman
25/09/2026