

Severfield plc

Whistleblowing policy and procedure

April 2023



Foreword

The board of Severfield plc is committed to ensuring that we act at all times with integrity and maintain the highest standards of corporate ethics in all areas of our operation. To achieve this, the board wishes to encourage effective and honest communication and is committed to a robust response to any malpractice brought to its attention.

This Whistleblowing Policy and Procedure enables anyone to raise genuine concerns about malpractice in the knowledge that their concerns will be taken seriously and that they will be protected from possible reprisals by colleagues and management.

Alan Dunsmore
Chief Executive Officer

Why this policy is important and who it applies to

Integrity is one of our core values and the highest standards of conduct and business integrity are expected from every employee. If you have concerns that someone's conduct is, or could be, falling short of what we expect, we want you to speak up about it.

We understand that this can be a difficult thing to do and this policy aims to reassure you that anyone who reports, in good faith, any form of malpractice or behaviour which falls short of an acceptable standard, will be protected.

This policy applies to all employees within the Group. The reporting channels and procedures are also available to temporary workers, agency staff, secondees, external consultants and contractors whilst they are working for the Group.

Defining 'malpractice'

Malpractice is any form of behaviour that breaks the law, is unethical, or contravenes our vision and values.

The following are examples of malpractice:

- Creating a risk or potential risk to health and safety of any person
- Causing damage to the environment
- Abusing a position of authority
- Any victimisation, harassment, discrimination or act of abuse towards any other employee
- Criminal activity committed by any person working for or on behalf of the Group, including bribery, corruption, fraud or theft and facilitating tax evasion.
- Any act of human slavery or human trafficking within Severfield or the supply chain
- Concealing or ignoring any of the above.

We will protect you

If you speak up against or disclose information relating to malpractice in good faith, believing your information is accurate, we will protect you even if you are wrong.

Reporting on malpractice will not disadvantage your career or affect your relationships at work. We will not tolerate any form of retribution, discrimination or bullying of anyone who has spoken up in good faith.

If any employee is subjected to harassment or victimisation by colleagues or management as a result of their actions, we will act immediately to stop it and will take disciplinary action against the perpetrators.

Additional protection

In certain circumstances, whistleblowers are afforded protection by the Public Interest Disclosure Act 1998. A brief description of this Act and how you can find out more about it are included later in this policy.

Seeking advice before you act

If you have concerns or suspicions about malpractice but want advice before speaking up, you can contact the Group HR Director, or the Group Legal Director, who will listen to your concerns in confidence and discuss the procedures with you.

If you feel you need advice from someone outside Severfield, the independent charity Protect has an advice line: telephone 020 3117 2520.

Malicious allegations

Making a malicious allegation of malpractice is a serious offence and we will take disciplinary action against anyone who does so.

How to raise a concern

If you honestly believe or have a reasonable suspicion that malpractice is occurring or is likely to occur, your first step should be to inform your immediate manager, your head of department or the Group Legal Director.

The information you give will be considered carefully and they will decide whether there are grounds for investigation. You will be notified of the intended course of action. If the decision is to proceed with further investigations, the Group Legal Director will be contacted to instigate the formal process.

If, having made a disclosure to your immediate manager and head of department, you are unhappy with the outcome you can contact any member of the Executive Committee. If the matter relates to safety, health or environment you should contact the Group SHE Director and, if it relates to an HR issue, the Group HR Director. You can always report your concerns directly to the Group Legal Director or any other member of the Executive Committee. If your concern involves a member of the Executive Committee then you should contact our CEO Alan Dunsmore or our Chairman Kevin Whiteman.

What happens next?

The investigation

Where an investigation is required it will be formally initiated by the Group Legal Director in consultation with either the Group SHE director, the Group HR director or the Finance Director for your business. In order to maintain confidentiality and carry out an effective internal investigation, the number of personnel involved will be kept to a minimum.

In the interests of confidentiality and fairness, you should not discuss the matter further and you will not be contacted unless you have indicated that you are willing to be contacted by someone directly involved in the investigation.

You will be able to contact the Group Legal Director to follow the progress of the investigation including when the investigation has been completed and, where possible, you will be told of the outcome should you request to be so notified.

Appeals procedure

If you are unhappy with the conduct or outcome of an investigation, you should raise your concerns with either the Chief Executive Officer or the Group Finance Director. You must do this within ten (10) working days of being notified of the outcome of the investigation.

The Chief Executive Officer or the Group Finance Director will review the investigation together with a member of the board who is unconnected with the process and they will take any further action that is appropriate. Their decisions will be final.

You will be notified of the outcome of their review and of their final decision.

Public Interest Disclosure Act 1998

This Act of Parliament, popularly known as the “Whistleblower’s Act” provides a framework within which workers can inform on illegal, unsafe and improper practices by their employers or colleagues.

Whistleblowers that make disclosures that qualify for protection under the Act have the right not to suffer detrimental treatment from their employer.

There is a useful guide at [PIDA - Protect - Speak up stop harm \(protect-advice.org.uk\)](https://protect-advice.org.uk) which sets out details of the types of disclosures which qualify for protection and the way in which such disclosures can be made, as well as the persons to whom disclosures may be made.

Further information

Group Legal Director

Call Mark Sanderson on 01845 576757/07738724769

Group HR Director

Call Sam Brook on 01845 577896/07800627652

Group SHE Director

Call Phillipa Recchia on 01845 577896/07800627842

Protect

Whistleblowing Advice Line: 020 3117 2520