

Renew Holdings plc - Whistleblowing Policy

Introduction

This policy applies to all colleagues and officers of Renew Holdings plc and its subsidiaries ("Renew") **including AmcoGiffen**. Other individuals performing functions in relation to the company, such as agency workers and contractors, are encouraged to use it. It is important to the business that any fraud, misconduct or wrongdoing by colleagues or officers of Renew is reported and properly dealt with. Renew therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Colleagues should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

- Any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.
- No worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the company Disciplinary Procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, colleagues should not agree to remain silent. They should report the matter in accordance with the procedure set out below.

This procedure is for disclosures about matters other than a breach of a colleagues own contract of employment. If a colleague is concerned that their own contract has been, or is likely to be, broken, they should use the company Grievance Procedure. For examples of whistleblowing please visit <https://protect-advice.org.uk/case-studies/>

Procedure

1. In the first instance, and unless the worker reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach their line manager, any concerns should be raised with the worker's line manager. If they believe the line manager to be involved, or for any reason does not wish to approach the line manager, then the worker should proceed straight to stage 3.
2. The line manager will arrange an investigation into the matter (either by investigating the matter personally or immediately passing the issue to someone in a more senior position). The investigation may involve the worker and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The worker's statement will be considered, and they will be asked to comment on any additional evidence obtained. The line manager (or the person who carried out the investigation) will then report to the Director, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If

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disciplinary action is required, the line manager (or the person who carried out the investigation) will report the matter to the HR department and start the disciplinary procedure. On conclusion of any investigation, the worker will be told the outcome of the investigation and what the Director has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

3. If the worker is concerned that their line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the Director, they should inform the nominated independent representative. The nominated independent representative will arrange for another manager to review the investigation carried out, make any necessary enquiries, and make their own report to the Director as in stage 2 above. If for any other reason the worker does not wish to approach their line manager, they should also in the first instance contact the nominated independent representative. Any approach to the nominated independent representative will be treated with the strictest confidence and the worker's identity will not be disclosed without their prior consent.
4. If, in extremely rare instances, it would not be appropriate to contact a line manager, nominated independent representative or Director, then contact should be made with Renew's Group Company Secretary and Chief Financial Officer who can be contacted on 0113 281 4200 or by email at whistleblowing@renewholdings.com.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. Renew strongly encourages colleagues to seek advice before reporting a concern externally. In the event that a colleague deems it appropriate to make an external disclosure, 'Protect' operates a free and confidential helpline the details of which can be found at the end of this policy.

Protection and support for whistleblowers

Renew aims to encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken. Colleagues must not suffer any detrimental treatment as a result of raising a genuine concern. If an individual has suffered any such treatment, they should inform their line manager or nominated independent representative immediately. If Renew conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

General Data Protection Regulation (GDPR)

Renew is committed to protecting the privacy and security of your personal information. For information on how we collect and use personal information about you in accordance with GDPR, please refer to Renew's Privacy Notice which is available on the Group's website at www.renewholdings.com/privacy-policy. You should also refer to the Privacy Notice issued to you by AmcoGiffen. Please note that, in a whistleblowing context, data subject rights may be restricted for the prevention, investigation, detection or prosecution of criminal offences or civil law claims.

If there is any doubt as to how to proceed, please contact any of the people named in this document who will be able to provide guidance. This policy does not form part of any colleagues contract of employment and Renew may amend it at any time.

Contacts

AmcoGiffen Independent Representative

Steve Czirok
Head of Human Resources (Projects)
01226 243 413
steve.czirok@amcogiffen.co.uk

Group Company Secretary

Sean Wyndham-Quin
0113 281 4200
whistleblowing@renewholdings.com

Protect Helpline
(Independent whistleblowing charity)

020 3117 2520
whistle@protect-advice.org.uk
www.protect-advice.org.uk

This Policy will be reviewed annually, as a minimum, to ensure its continued effectiveness.



John Booth
Managing Director