



# GROUP WHISTLEBLOWING POLICY

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*You sometimes know when someone is doing something illegal, unethical or improper but may be afraid about voicing your concern. If you do report your concern, you will be protected from any reprisal or victimisation.*

***You can report your concern via our 'SPEAK UP' hotline, either online or by phone.***

## **Basis**

Hill & Smith PLC and its operating companies (the 'Group') ensure that all Group employees, directors, consultants, contractors, casual workers, agency employees and all others who are acting for the Group (collectively referred to as 'employees' in this Policy) are able to raise a matter of concern without fear of reprisal.

## **Principles**

The Group is committed to the highest standards of quality, honesty and accountability in all that it does, and we all have a collective duty to speak up if we notice any behaviour that concerns us. The act of speaking up is called 'Whistleblowing'.

You do not need to wait for proof when reporting a concern; you only need to have a reasonable suspicion. It is not for you to investigate or prove that your concerns are valid, but you should always tell us and we will always listen.

## **Adoption**

This Policy has been adopted by the Group and will be updated or modified as appropriate. This Policy does not form part of any employee's contract of employment and we may amend it at any time.

## **Implementation**

The Board of Hill & Smith PLC has overall responsibility for compliance with this Policy. The senior leadership teams of each Operating Unit are responsible for the detailed oversight of the operation of the Policy and reporting to the Group's Board as and when appropriate matters arise.

## **Our Commitment**

If you raise a concern under this Policy, you will not be at risk of losing your job nor will you suffer any form of reprisal, even if your report is mistaken and/or the facts later turn out to be inaccurate and do not result in further action.

## **Forms of Whistleblowing**

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of our internal policies or legal or professional obligations. This Whistleblowing Policy encourages you to speak out in situations where the interests of the Group or the safety of others is put at risk.

A whistleblower is a person who raises a concern relating to any of the matters detailed above. If you have any concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure applicable in your operating business, or you should in the first instance review the Equal Opportunities and Diversity Policy or Dignity at Work Policy as appropriate.



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## How to raise a concern

In the first instance, where appropriate you should report your concern to your direct Line Manager, Managing Director, Group President or Finance Director. These individuals may be able to agree a way to resolve your concern quickly and effectively.

We understand there may be situations where you feel unable to report a concern to your Line Manager, Finance Director, Managing Director, or Group President. In these circumstances you can report a concern, anonymously or not, by either:

1. Via our online 'SPEAK UP' portal, provided by Navex Global EthicsPoint at <https://hsigroup.ethicspoint.com>
2. By telephoning Navex Global EthicsPoint using the numbers below based on the country you are in;
  - Australia 1-800-139957
  - India 000-117 at prompt dial 855-315-870
  - Ireland 1-800-89-0011 at prompt dial 855-229-6309
  - UK 0808-234-7287
  - USA 855-229-9304
3. Via email to [compliance@hsigroup.com](mailto:compliance@hsigroup.com)
4. By letter, addressed to the Group Company Secretary at the Group's registered office: Westhaven House, Arleston Way, Solihull, B90 4LH, UK

If you have raised a concern through one of the methods above and you still have concerns, or if you feel the matter is so serious it cannot be discussed by any of the above methods, you should contact the Group's Audit Committee Chair at [exec.office@hsigroup.com](mailto:exec.office@hsigroup.com).

We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

## Protection for Whistleblowers

We aim to encourage openness and will support whistleblowers who raise concerns under this Policy, even if they turn out to be mistaken.

Whistleblowers will not suffer any detrimental treatment as a result of raising a concern. If you believe that you have suffered any such treatment, you should inform Karen Atterbury, Group Company Secretary immediately on [karen.atterbury@hsigroup.com](mailto:karen.atterbury@hsigroup.com).

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

**Approved by the Board of Directors of Hill & Smith PLC  
28 January 2025**