

Whistleblowing policy

PURPOSE:

Bradford Watts Ltd is committed to operating with integrity, transparency, accountability and full legal compliance.

This policy provides a safe and confidential process for raising concerns about wrongdoing, unlawful conduct, unsafe practices, or unethical behaviour occurring within the company or by those acting on its behalf.

This policy complies with:

- Employment Rights Act 1996 (Part IVA – Protected Disclosures)
- Public Interest Disclosure Act 1998
- ACAS Code and Guidance
- UK Corporate Governance best practice

This policy does not form part of any contract of employment and may be amended.

WHO IS COVERED:

This policy applies to employees, workers, agency staff, contractors, subcontractors, consultants, apprentices, suppliers, officers and any individual working on behalf of Bradford Watts Ltd.

Where an individual falls within the statutory definition of a “worker”, legal whistleblowing protections apply in accordance with UK legislation.

WHAT IS A PROTECTED DISCLOSURE?

A protected disclosure is information which, in the reasonable belief of the individual making it, is in the public interest and tends to show:

- A criminal offence
- Failure to comply with a legal obligation
- Miscarriage of justice
- Danger to health and safety
- Environmental damage
- Bribery, corruption or fraud
- Breach of professional standards
- Deliberate concealment of any of the above

Personal employment grievances should normally be raised under the Grievance or Dignity at Work procedures unless wider public interest concerns are involved.

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OUR COMMITMENT:

Bradford Watts Ltd will:

- Take concerns seriously
- Investigate fairly and proportionately
- Protect whistleblowers from retaliation
- Maintain confidentiality wherever reasonably practicable

No individual will suffer dismissal, detriment, disadvantage, discrimination, loss of work, or victimisation for making a protected disclosure in good faith.

Retaliation may constitute gross misconduct.

REPORTING ROUTES:

Primary Contact:

SHEQ Manager – Fraser Pimley E: fpimley@bradfordwatts.co.uk

Alternative Contacts:

- Managing Director
- Any Senior Manager
- Confidential E: whistleblowing@bradfordwatts.co.uk

Concerns may be raised verbally or in writing. Include names, dates, locations and supporting evidence where possible.

Where senior management are involved, normal reporting lines may be bypassed.

ANONYMOUS REPORTING:

Anonymous disclosures are accepted. However, investigation may be limited where insufficient information is provided.

Confidentiality will be maintained as far as reasonably practicable.

EXTERNAL REPORTING RIGHTS:

While internal reporting is encouraged, individuals have the legal right to make protected disclosures to prescribed regulators or, in certain circumstances, more widely under the Employment Rights Act 1996.

No disciplinary action will be taken for lawful protected disclosures.

INVESTIGATION PROCEDURE:

- Acknowledgement normally within 5 working days
- Preliminary assessment conducted
- Investigating officer appointed where appropriate
- Meetings may be held – companion permitted
- Updates normally within 20 working days
- Investigations conducted fairly, independently and proportionately

Full findings may not always be shared due to legal confidentiality requirements.

OUTCOME & REVIEW:

Corrective actions will be implemented where required. Disciplinary action may follow substantiated wrongdoing.

If dissatisfied, the whistleblower may request review by the Managing Director.

PROTECTION FROM DETRIMENT:

Workers subjected to detriment may have statutory employment tribunal rights.

Retaliation against whistleblowers will result in disciplinary action.

MALICIOUS OR FALSE ALLEGATIONS:

Honest concerns, even if mistaken, will not result in disciplinary action.

Knowingly false or malicious allegations may lead to disciplinary action.

DATA PROTECTION:

All whistleblowing information will be handled in accordance with UK GDPR and the Data Protection Act 2018.

Information will be stored securely and retained only as necessary.

SUPPORT & ADVICE:

Independent confidential advice:

Protect (formerly Public Concern at Work)

www.protect-advice.org.uk

SAVING CLAUSE:

Nothing in this policy removes statutory rights under the Employment Rights Act 1996.

Protected disclosures remain legally protected regardless of internal procedures.

GOVERNANCE & REVIEW:

This policy will be reviewed annually or sooner if required by legal or organisational changes.

Policy Owners:

SHEQ Manager & Managing Director

D. Pitcher, MD
MICOB



Date:26/02/2026

F. Pimley:
SHEQ Manager



Date:26/02/2026