

KGJ Price [Railway Contractors] are committed to operating to the highest standards of transparency, integrity and accountability across its business operations. We welcome, expect and encourage all staff, subcontractors and interested stakeholders to raise concerns and issues without fear of reprisal or victimisation.

Our policy will encourage and support all those who raise genuine concerns about any of our working practices, behaviours and operations. This may include but is not limited to:

- Financial or commercial malpractice
- Criminal activity including theft
- Breaches of legislation including human rights and waste disposal
- A culture of bullying or harassment
- Conflicts of interest
- Dishonesty when dealing with employees, clients and suppliers

KGJ Price [Railway Contractors] is committed to operating according to the highest standards of transparency, integrity and accountability across all business lines and contracts. This policy enables KGJ Price [Railway Contractors] employees, our associates and sub-contractors to raise any serious concerns they may have about inappropriate activity without fear of reprisal.

We require all employees and sub-contractors to adhere to the highest principles in their work. In what we hope is the unlikely event of it being required, this policy will:

- Help you feel confident to act upon and raise any serious concerns you may have;
- Help you understand the process and ensure you are kept informed of progress and next steps;
- Providing you have made your allegation in good faith, protect you from any form of victimisation

Whilst it is possible for a concern to be raised in confidence, the nature of any investigation may require you to be called as a witness and therefore lose your right to anonymity at some stage in the future.

## SCOPE

The policy applies to all KGJ Price [Railway Contractors] employees, associates and all employees working for suppliers and delivering services on our behalf.

KGJ Price [Railway Contractors] additionally has both a complaints procedure and grievance procedure which you should use to raise any issues you may have about your own employment. Whistle-blowing is intended for serious concerns that fall beyond their scope, examples of which include:

- conduct which may be an offence or a breach of law
- disclosures related to miscarriages of justice
- health and safety risks, including risks to the public as well as other employees
- damage to the environment
- unauthorised use of public funds

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- possible fraud or corruption
- sexual or physical abuse of customers
- other unethical conduct

## WHAT IF I'M WRONG?

We recognise it may be extremely difficult to raise a concern in the first place, particularly if it relates to the conduct of a friend or long-standing colleague. If you make an allegation in good faith that any subsequent investigation proves to be unfounded, no action will be taken against you.

However, if you invoke this whistle-blowing policy maliciously, frivolously, or with the intent of personal gain, you may be subject to disciplinary action. Nor will doing so protect you from any on-going disciplinary or redundancy procedure.

## HOW TO RAISE A CONCERN

- In the first instance, you should raise your concerns with your Manager unless your allegation relates to him in which case you should contact Dan Rivers, our Managing Director.
- You can raise your concern verbally or in writing. If you write it down, please include the following information:
- the background and history of your concern (with dates where appropriate);
- the reason(s) why you are particularly concerned

Bear in mind that the earlier you express your concern, the easier it will be to take action. Although you are not expected to be able to categorically prove the truth of your allegation, you will need to demonstrate reasonable grounds for raising it.

- To help you do this, you may wish to discuss your concern with a colleague and raise the matter collectively if there are two (or more) people of a similar opinion or with similar experiences.
- You can bring someone with you to attend any meetings or interviews that may take place in connection with your concerns and any subsequent investigation into them.

## WHAT'S NEXT?

1. Your Manager is responsible for, if necessary, in consultation with the Managing Director, identifying next steps. In order to protect everyone involved, initial enquiries will be made to establish whether or not a more formal investigation is appropriate and, if so, what form it should take.
2. This may include the matter being:
  - investigated by management, internal audit or through KGJ Price [Railway Contractors]'s disciplinary process;
  - referred to the police;
  - referred to an external auditor or other external consultant;
  - the subject of an independent inquiry

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3. Some concerns may be resolved by action agreed without the need for investigation.
4. In all cases where a timelier resolution is not possible, within 10 working days of you raising your concern, your Manager (or, in his absence, another Director) will write to you to:
  - acknowledge that your concern has been received;
  - outline how we propose to deal with the matter;
  - provide you with an estimate of how long it will take to reach a final response;
  - explain whether any initial enquiries have been made;
  - tell you whether further investigations will take place and if not, why not.
5. The amount of communication between the person raising the concern and the Director leading any investigation will depend on its subject matter and sensitivity, and indeed the clarity of information provided in the first instance. If necessary, they will come back to you to request further information.
6. As at the initial meeting, if any further meetings are required, you can request for them to be held off company premises and be accompanied by a colleague or friend.
7. KGJ Price [Railway Contractors] will take steps to minimise any difficulties which you may experience as a result of raising a concern. For example, if you are required to give evidence in criminal or disciplinary proceedings, we will arrange for you to receive advice about the procedure.
8. We recognise that anyone invoking this policy will want to be assured that their concern has been properly addressed. Subject to legal constraints, we will always inform you of the outcome of any investigation.

Mervyn Harris



Director  
01.05.24

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