

WHISTLEBLOWING POLICY



POLICY STATEMENT

Bell Group UK is committed to achieving and maintaining high standards with regard to behaviour at work, service to the public in all our working practices. Employees are expected to conduct themselves with integrity, impartiality and honesty. Bell Group UK (The Company) seeks to develop a culture where inappropriate behaviour at all levels is challenged. To achieve this the Company encourages the reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation.

Bell Group has established ways and procedures by which you can raise issues which concern you at work and these can be acted upon. At the same time striving to reassure you that in raising concerns you will not be opening yourself to victimisation, detriment, or risking your job security. In addition to what the Company regards as open management, you also enjoy statutory protection if concerns are raised in the right way.

The Bell Group UK Whistleblowing Policy is intended to complement statutory protection rather than detract from it. For the avoidance of doubt, your statutory rights will not be affected in any way by the Whistleblowing Policy.

The Public Interest Disclosure Act 1998 (see below) provides employees with protection against victimisation or being penalised should they reasonably report concerns.

This policy is accompanied by a procedure that should be followed when "blowing the whistle". The policy is designed to give you that opportunity and protection.

Bell Group UK will not tolerate harassment or victimisation of a genuine whistle blower (including informal pressures) and will treat such conduct as gross misconduct, which if proven, may result in dismissal.

This policy is non contractual and Bell Group UK reserves the right to amend or withdraw the policy and procedure at any time.

If there is anything which you think the Company should know about, please use the procedure. By knowing about malpractice at an early stage the company stands a good chance of taking necessary steps to safeguard the interests of others and protect the organisation. In short, please do not hesitate to "blow the whistle" on wrongdoing.

WHAT IS WHISTLEBLOWING?

Whistleblowing is specific and means a disclosure of information in the interest of the public, made by both employees and non-direct employees, such as subcontractors and suppliers, where they reasonably believe that one or more of the following matters is; happening now, took place in the past or is likely to happen in the future:

Whistleblowing issues:-

- a criminal offence;
- a failure to comply with a legal obligation (e.g. breach of a contractual or other common law obligation, statutory duty or requirement or administrative requirement, including suspected fraud, malpractice or breach of a code of conduct);
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- damage to the environment;
- a deliberate concealment of information tending to show any of the above.

Only genuine concerns should be reported. Whistleblowers must hold a reasonable belief that any information and/or allegation is substantially true, and the disclosure should not be made primarily or solely for personal gain. Malicious or false allegations will be treated as a serious disciplinary offence.

Employees raising a concern

In order to encourage employees to report suspected wrongdoing, our aim is to create a culture of openness and accountability and an environment in which individuals feel confident that their concerns will be taken seriously.

You should first raise your concern with your line manager either verbally or in writing. Your line manager may be able to address your concern quickly and effectively or may decide to refer the matter to another person within the organisation. If your concern relates to the conduct of your line manager or you feel that your line manager has not resolved your concern, you should report the matter to your Branch Manager.

Alternatively, you may wish to discuss your concerns, in confidence, with:

Bell Group's Human Resources Manager, Paramjit Barry (HR@bellgroup.co.uk) who is the nominated manager with responsibility for dealing with concerns raised under this policy and where appropriate ensuring that an investigation is conducted

Anonymous allegations can be harder to investigate than those from named individuals. All concerns raised will be dealt with confidentially and individuals are urged to avoid making anonymous allegations.

If your disclosure is about a director or senior executive you should report your concerns directly to the Managing Director of Bell Group UK who will decide how the investigation should proceed.

If you are unhappy with the way in which a concern you have raised has been dealt with, you may refer to the process for the 'right to appeal'.

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CIRAS

CIRAS, the confidential incident reporting and analysis system, as adopted by Network Rail, provides a corporate safety net that ensures safety, health or other concerns are captured within Organisations and with CIRAS' help, such concerns are investigated to a successful and satisfactory conclusion.

For any Bell Group employee working on a Network Rail project, on any site on behalf of Abellio Scotrail or other transport projects, any concerns outlined above, categorised as 'whistleblowing issues, should be raised in the first instance with your Contract manager and reported to CIRAS.

There are a number of ways to get in touch with CIRAS:

POST: The Helicon, One South Place, London, EC2M 2RB

PHONE: General Enquiries: 0203 142 5369 / Report hotline: 0800 4 101 101 / Report Text line: 07507 285887 Phone: 020 3142 5367

EMAIL: enquiries@ciras.org.uk

Others wishing to report a concern

Agents, contractors, sub-contractors, consultants, suppliers, customers, members of the public and external organisations are encouraged to raise a genuine concern about Bell Group UK relating to the areas outlined in the 'whistleblowing issues' listed above.

You should report the matter to the National Quality Manager, Tracy Brescia, who is the nominated executive with responsibility for dealing with concerns raised under this policy and where appropriate ensuring that an investigation is conducted.

