

| Document Details | | | |
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| Author | HR Director (V Wood) | Next Review | August 2026 |
| Reviewed by | Senior Management Team | Last reviewed | 28/8/2025 |
| Approved by | CEO (M Eburne) | Approval date | 30/9/2025 |

| Version history | | | | |
|-----------------|-----------|------------------|---|-------------------|
| Version | Date | Author | Reason for new version | Sections affected |
| 1.1 | 23/8/2024 | CFO (JM) | | |
| 1.2 | 30/9/2025 | HR Director (VW) | Raise concern personnel changes and layout simplified | 5 |

1. Policy Statement

SRL is committed to fostering a culture of openness, integrity, and accountability. We encourage all employees, contractors, and stakeholders to speak up if they have genuine concerns about wrongdoing within the organisation. This includes concerns about:

- Criminal offences
- Breaches of legal obligations
- Health and safety risks
- Environmental damage
- Miscarriages of justice
- Attempts to conceal any of the above

We value transparency and will support anyone who raises concerns in the public or company interest.

2. Purpose of This Policy

This policy provides guidance for individuals who wish to raise concerns confidentially and responsibly. It ensures that:

- Concerns are taken seriously and investigated appropriately
- Individuals are protected from retaliation or disadvantage
- SRL complies with its legal obligations under the *Public Interest Disclosure Act 1998*

3. Protection for Whistleblowers

If you raise a concern in good faith and with reasonable belief that it is true, you are protected—even if it turns out to be mistaken. SRL strictly prohibits any form of retaliation, including:

- Dismissal or disciplinary action
- Harassment or bullying
- Denial of contractual rights or opportunities

If you experience any detriment after raising a concern, report it immediately so it can be addressed without delay.

4. What Can Be Reported?

You can raise concerns about any suspected wrongdoing, including but not limited to:

- Criminal activity or fraud
- Breach of legal or regulatory obligations
- Health and safety violations
- Environmental harm
- Deliberate concealment of any of the above

You do not need to provide proof—only a reasonable belief that the information is substantially true.

5. How to Raise a Concern

You can report concerns to any of the following individuals:

- **Group Chairman** – Kevin O’Connor: kevin.oconnor@srl.co.uk 07469 246660
- **Group CEO** – Mark Eburne: mark.eburne@srl.co.uk
- **HR Director** – Victoria Wood: victoria.wood@srl.co.uk
- **Your Departmental/Divisional Director**
- **Your Line Manager**

All reports will be treated confidentially, as far as possible. You may be asked to participate in an investigation or hearing as a witness.

6. Investigation Process

Once a concern is raised:

1. It will be acknowledged and assessed promptly.
2. An appropriate investigation will be conducted.
3. You may be asked to provide further information or attend a meeting.
4. Outcomes will be communicated where appropriate, while maintaining confidentiality.

7. Safeguards and Support

We are committed to ensuring that:

- Your working relationships are not adversely affected
- You are not victimised or penalised
- You receive appropriate support throughout the process

8. Policy Review

This policy will be reviewed annually and updated as necessary to ensure compliance with legal requirements and best practices.

This Policy Statement is reviewed annually.

Mark Eburne
Chief Executive Officer

Dated: 30th September 2025