

Policy on Whistleblowing



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Document purpose and scope

This document sets out the Whistleblowing policy of JBA Group Limited and its subsidiary Operating Companies, collectively known as 'JBA'. It covers activities undertaken by the Group throughout all office locations and operations worldwide.

This document will be reviewed for continued suitability, will be communicated within the JBA Group and, if appropriate, made available to interested parties. The review interval for this document is 1 year.

The policy applies to all employees and the safeguards offered by this policy, in relation to raising concerns about JBA practices, are extended to contractors and suppliers working for us both in our premises or project offices and those providing services under a contract with JBA in their own premises.

This policy covers certain disclosures of information that are protected by law. The reporter must believe the disclosure, tends to show that one or more of the following has either taken place, is happening or is likely to happen in the future:

- A criminal offence, for example fraud.
- Someone's health and safety is in danger.
- Risk or actual damage to the environment.
- A miscarriage of justice.
- The company is breaking the law, for example does not have the right insurance.
- Someone is covering up wrongdoing.

If you cannot go to someone in JBA with the disclosure, you can contact a prescribed person or body (guidance is available from GOV.UK – **Whistleblowing: list of prescribed people and bodies - GOV.UK (www.gov.uk)**).

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest. 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** which can be used to raise issues regarding terms and conditions of employment, health and safety, work relations, bullying and harassment, new working practices or organisation change and discrimination. Our **complaints procedure** can be used to raise any dissatisfaction about the service, action or lack of action made by JBA or our staff, sub-contractors or sub-consultants, affecting an individual member of the public or other third party group or organisation.

Aim

Whistleblowing encourages and enables employees to raise serious concerns within an organisation rather than overlooking a problem or raising their concerns to persons outside the Group.

Employees are often the first to realise that there is something seriously wrong with the way an organisation, including its suppliers, operates. However, they may not be able to easily express their concerns as they feel that speaking up would be disloyal to their colleagues or to the organisation.

This policy aims to

- encourage staff (and others) to report suspected wrongdoing internally as soon as possible;
- encourage staff and others to feel confident that they can raise concerns confidentially and to question and act upon any concerns they may have about such practices within JBA, without negative implications;
- provide avenues for staff and others to raise concerns in confidence and receive feedback on any action taken;
- enable staff and others to receive a response to any concerns raised and be aware of further action that can be taken if they are not satisfied with the response; and
- reassure staff and others that they will be protected from possible reprisals or victimisation if they have a reasonable belief that the information disclosed tends to show wrongdoing and that the disclosure is made in good faith.

Policy statement

JBA is committed to The Ten Principles of the UN Global Compact and acting responsibly in all aspects of the areas of human rights, labour, environment and anti-corruption.

We are committed to the highest possible standards of openness, probity and accountability. In line with this commitment, we expect employees, and others that we deal with, who have serious concerns about any aspect of our or our suppliers' work to come forward and voice those concerns.

We will comply with all legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate. We will seek to comply with client policies where required and reasonably possible to do so without conflicting with our own policies or other obligations.

Responsibilities

The JBA Group Board is responsible for reviewing and approving the content and implementation of this policy and will help each Operating Company to apply this policy through procedures, guidance and monitoring. The JBA Group Compliance Officer is the JBA Group Executive Chair.

Overall compliance with the requirements of this policy is the responsibility of each Operating Company within the Group. The Managing Director of each Operating Company will oversee their company's adherence to this policy. Operating Company Directors and Management Teams are responsible for taking measures to promote this policy and help their staff to comply with its requirements.

All staff are required to comply with this policy and are encouraged to support its effective implementation by raising genuine concerns in good faith.

Line managers are required to check that their staff are aware of this policy and any associated guidance.

Implementation

Safeguards and victimisation

We recognise that the decision to report a concern can be a difficult one to make.

We will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate disciplinary action to protect those who raise a concern in good faith. Victimisation of a whistleblower will be treated as a serious disciplinary offence by JBA. Support will be given to the individual who has raised concern during and after the issue being dealt with. Any individual who feels they are being bullied, harassed or victimised as a result of blowing the whistle should notify their line manager, or more senior manager if appropriate, and refer to our [grievance procedure](#).

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the reporter's identity, if they so wish. At the appropriate time, however, they may need to come forward as a witness.

Reports can be made anonymously but this policy encourages reporters to put their name to their concern whenever possible. Providing their name will allow the reporter to receive a response and it will help our investigation if we can obtain all the facts from them. Reporters must

- disclose the information in good faith;
- believe it to be substantially true;
- not act maliciously or make false allegations; and
- must not seek any personal gain.

How to raise a concern

As a first step, employees should normally raise concerns with their immediate line manager or their superior. This can be done verbally or in writing. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if an employee believes their line management is involved, they should approach a more senior level of management or HR. Employees can also submit whistleblowing concerns to Chris Schofield, a JBA Group Non-Executive Director, via IMS.

Confidential reports can be submitted from the **Report It! page** in IMS to HR or the JBA Group Compliance Officer. Anonymous reports can be submitted from the **Report It! page** to HR.

External parties wishing to raise a concern should do so either via their usual contact within JBA or by writing to:

Chris Schofield, Non-Executive Director, JBA Group
1 Broughton Park, Old Lane North
Broughton, SKIPTON, BD23 3FD, UK
Email: chris.schofield@jbagroup.co.uk

How we will respond to a concern being raised

The JBA manager receiving the concern will acknowledge its receipt as soon as possible (unless the concern is reported anonymously) and will identify an independent person who will deal with the issue.

We will aim to investigate and respond to concerns as quickly as possible, but this time period may vary depending upon the complexity of the issue and a response will not be possible if the concern is raised anonymously. Within 15 working days of the date of our acknowledgement, we will either send the reporter a full response detailing the findings of the investigation or, if more details or further investigation are required, a progress report. Where possible, we will include our full response within our initial acknowledgment.

Any actions proposed as a result of this concern being raised will be reviewed and acted upon, as appropriate, and in accordance with our procedures. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way.

If the reporter is not satisfied with the response received, they will be offered the opportunity to escalate the matter to a more senior member of staff. Ultimately this may result in a member of the Operating Company Board or JBA Group Board being involved.

Approval

This document was approved by the Board of JBA Group Limited on 15/12/2025.



Executive Chair, JBA Group