



Services to the Onshore Natural Gas Industry

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Whistle-Blowing Policy

The Company is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have any serious concerns about any aspect of the Company's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis. This Policy makes it clear that employees, placed consultants and sub-contractors can do so without fear of victimisation, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable the raising of any serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

This policy is in addition to complaints procedures and grievance procedures in relation to employment and other statutory reporting procedures. As a first step, individuals should raise any concerns with their immediate manager but may choose instead to take the matter to the QHSE Compliance Manager or Managing Director. The individual will need to demonstrate to the person contacted that there are reasonable grounds for their concern. The Company will record and respond to concerns raised and investigate them before either accepting or rejecting them.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary process
- be referred to the police
- be referred to the external auditor

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted. A timescale will be agreed and, subject to legal constraints, the Company will inform the individual who raised the issue of the outcome of any investigation.

If the individual is not satisfied with the outcome, they may refer to the Whistle Blowing guidelines maintained in the Quality Management System for further contact points to take the issue further. One such contact is Acas. Acas offer a helpline for free support and advice. The Acas Helpline provides free and impartial advice for employers, employees and representatives on a range of employment relations, employment rights, HR and management issues.

Helpline number: 0300 123 1100

Monday-Friday: 8am-8pm and Saturday 9am-1pm

The Managing Director has overall responsibility for the maintenance and operation of this policy and will ensure a record is maintained of any concerns raised and their outcome.

This Policy is reviewed annually as part of the management review held in accordance with the company's accredited management systems and on an ad hoc basis where considered appropriate by the Managing Director. This Policy is displayed on the company website, and is explained to employees on induction.



Graham Wilcock
Managing Director
25th May 2023

Rev. 12 Reviewed following Management Review Meeting 18/05/2023



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