

WHISTLEBLOWING POLICY

Purpose

This policy establishes procedures for employees to report concerns about illegal or unethical activities within the organisation. It is intended to provide a safe and confidential environment for employees to raise issues without fear of retaliation.

Scope

This policy applies to all employees of Brenmar Ltd

Definition of Whistleblowing

Whistleblowing is the disclosure of information by an employee to a responsible person within the organisation or to an external authority about a wrongdoing or suspected wrongdoing that is related to the organisation's business.

Types of Concerns

Employees may report concerns about:

- Illegal activities
- Unethical behaviour
- Violations of company policies
- Fraud
- Waste
- Abuse of power
- Discrimination
- Harassment

Channels for Reporting

Employees may report concerns through the following channels:

Direct Manager: If the employee feels comfortable, they may report the concern to their direct Site or Project Manager.

Operations & Compliance Manager: The operations & Compliance Manager is designated as the primary point of contact for whistleblowing reports.

External Authority: In certain circumstances, employees may report concerns to an external authority, such as law enforcement or a regulatory agency.

Confidentiality

The organisation will take reasonable steps to protect the confidentiality of whistleblowers. However, in some cases, it may be necessary to disclose the identity of a whistleblower to investigate or resolve a concern.

Protection Against Retaliation

The organisation prohibits any form of retaliation against employees who report concerns in good faith. Retaliation includes, but is not limited to, demotion, termination, or other adverse employment actions.

Investigation

All reports of concerns will be investigated promptly and thoroughly. The investigation will be conducted by a person who is independent of the matter being investigated.

Reporting False or Frivolous Claims

Employees who make false or frivolous reports may be subject to disciplinary action.

Training

The organisation will provide training to employees on this policy and on the importance of reporting concerns.

Review and Updates

This policy will be reviewed and updated periodically to ensure its effectiveness.

Signed



Mark Harvey

Director

December 2025