

Whistleblowing Policy

Purpose

The purpose of this policy is to proactively encourage the reporting of concerns of malpractice or wrongdoing. Amey wants to ensure that all Employees and others working with it are able to raise concerns without fear of retribution, and that all such reports are given due consideration.

The Amey Code sets out various ways for concerns to be raised including by way of the whistleblowing process. This policy contains details of the whistleblowing process and provides more in-depth guidance and information into that process. This policy and the Amey Code reflect best practice and comply with all relevant legislation.

Policy

Amey is fully committed to the highest standards of openness, integrity and accountability and it aims to conduct its business at all times in a responsible manner. All Employees are required to act in a similar manner.

Amey is committed to complying with The Public Interest Disclosure Act 1998, also known as 'PIDA', and the Employment Rights Act 1996; (together the "Acts") to ensure that Employees cannot be punished, victimised, dismissed or made to suffer any detriment by their employer as a consequence of making a valid protected disclosure (as defined in PIDA).

Employees are strongly encouraged to raise concerns and report on any actual or suspected malpractice or wrongdoing including, inter alia, non-compliance with any laws or regulatory requirements, or breaches of The Amey Code or other applicable policies or procedures by Amey or its Employees or others working with it.

Any Employee acting in good faith, who identifies any such conduct, is able to make a disclosure in confidence and without fear of punishment or detriment. Such disclosure can be made either through their people manager or another senior manager in Amey, through an established reporting procedure such as the Grievance Process or through the dedicated independently managed Whistleblowing Helpline. Any disclosure so made, overrides any confidentiality provision in an Employee's contract and the normal restrictions that prevent Employees from divulging confidential information acquired during their engagement will not apply.

Amey undertakes to treat each disclosure with due regard and, if required, to undertake an investigation appropriate to the seriousness of the allegation or into such other matters as the Monitoring Officer may determine. Any investigation will be undertaken by an appropriate investigator appointed by the Monitoring Officer or their nominated representative. Any investigator appointed will be independent, and in most circumstances, will be from a different part of the business. The Monitoring Officer is the Director of Corporate Compliance reporting to the General Counsel.

Coverage

This policy is mandatory across all Amey businesses and operations.

This policy applies to all Employees - individuals working at all levels and grades, including (but not limited to) senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, agency staff, volunteers, interns, agents, sponsors or any other person associated with Amey (collectively referred to as "Employees" in this policy).

This policy also applies to Amey's joint venture operations, advisers and agents, and all suppliers used by Amey. Where disclosures are made by such joint venture operators, advisers, agents or their

employees, they will be treated as Employees by Amey for purpose of its obligations under the Acts and this policy, with the necessary changes as appropriate.

Within this policy all disclosing individuals are referred to as “Whistleblowers”.

This policy applies in all jurisdictions in the world where Amey operates, with necessary adjustments to ensure compliance and best practice in each jurisdiction.

Process

What is Required to Make a Disclosure?

To make a protected disclosure under this policy, a Whistleblower must have a “reasonable belief” that one or more of the following seven “failures” either has occurred or is likely to occur:

1. non-compliance with the Amey Code or other Amey policy
2. a criminal offence
3. a failure to comply with a legal obligation
4. a miscarriage of justice
5. an act creating risk to health and safety
6. an act causing damage to the environment
7. a deliberate concealment of information about any of 1-6 above.

Criteria 2 to 7 above are qualifying disclosures under the law. Criterion 1 is not a qualifying disclosure under the law but is given the status of a protected disclosure by Amey under this policy.

The Employee making the disclosure must:

1. have an honest and reasonable belief that one of the seven relevant “failures” set out above has occurred or is likely to occur; and
2. be making the disclosure in good faith, and in the company or public interest.

Whistleblowers who do not fulfil both these requirements lose the protection offered under the Acts and under this policy. An Employee does not have to be able to prove the allegation, but does need a reasonable and genuine belief that the information they share is true. While some allegations may prove to be unfounded, Amey would prefer the issues or concerns to be raised, rather than run the risk of not identifying a problem early on.

Who to Make the Disclosure to

Where appropriate, an Employee should first consider whether the matter can be resolved locally by raising it directly with the person in question, with their people manager, with another senior Amey manager or pursuing it through another more appropriate Amey policy or procedure, such as for example, the Grievance Policy (see flow chart at Appendix 1). There are well published and robust reporting mechanisms in place in respect of a range of matters including, for example, health and safety and employment issues. Should none of these options be applicable or appropriate then disclosure should be made through the independently managed Whistleblowing Helpline.

If a Whistleblower feels unable to raise the concern with their people manager or to any other person and there is no other appropriate reporting regime for such issues, or in circumstances where the Whistleblower is unsure with whom to raise their concern, the Whistleblower is encouraged to contact the independently managed **Whistleblowing Helpline (telephone 0800 160 1797)**. The Whistleblowing Helpline is provided by an independent third-party organisation, which will pass all information provided to the Monitoring Officer, speedily and unfiltered.

Whistleblowers using the Whistleblowing Helpline will be asked to set out the background and history of their concern, giving names, dates and places where known, and the reason they are particularly

concerned about the situation. Although Whistleblowers are not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for the concern.

Should a disclosure under this policy, be received by a people manager or person other than the Monitoring Officer, it is that person's responsibility to complete the Whistleblowing Referral Form (see Appendix 3) and send it to the Monitoring Officer without undue delay. Details should be provided of what actions, if any, have been taken to investigate and resolve the issue disclosed. It is important that all whistleblowing type disclosures are identified and brought to the attention of the Monitoring Officer. The Monitoring Officer will then be in a position to determine the need for any additional investigation or actions.

Anonymous Allegations

Employees are encouraged to give their name and contact details when making a disclosure. Anonymous disclosures will still be considered but may be more difficult and may take longer to investigate.

Any concern raised anonymously will be considered at the Monitoring Officer's discretion, considering the following factors:

- the seriousness of the issue raised
- the credibility of the concern and
- the likelihood of confirming the allegation from other sources.

Confidentiality

All protected disclosures will be treated in a confidential and sensitive manner and all reasonable steps will be taken to protect the identity of the Whistleblower making the allegation. However, the Whistleblower may be asked to provide a statement as part of the investigation.

Protection of Whistleblower

Amey undertakes that no one who makes a protected disclosure in the company's or public interest under this policy will be subjected to any punishment as a result of having made a protected disclosure. If a Whistleblower feels that they are being subjected to any prejudice or harassment as a consequence of their disclosure, then they must immediately inform their people manager or, if that is not appropriate, a senior person, such as a director or the Monitoring Officer, and appropriate action will be taken to protect them. However, a Whistleblower should be aware that making a protected disclosure may not necessarily protect them from other actions that may be unrelated to the disclosure.

Malicious Allegations

If a disclosure is subsequently deemed by the Monitoring Officer to be deliberately malicious, vexatious or knowingly false, disciplinary action may be taken against the person that made the disclosure.

Retraction of Allegation

Once the disclosure has been made it may be retracted by the Whistleblower at any time but Amey reserves the right to proceed with any investigation, even if the Whistleblower does not wish to proceed further.

Investigation of the Disclosure

For each disclosure made via the Whistleblowing Helpline, a Whistleblowing Referral Form (see Appendix 2) will be forwarded by the Whistleblowing Helpline to the Monitoring Officer.

Concerns or allegations that reasonably fall within the scope of other specific procedures, for example health and safety or grievance issues, will normally be referred on by the Monitoring Officer for consideration under those procedures. The Whistleblower is informed when this is the case.

The Monitoring Officer may consult with an Amey Executive Team member or other senior manager as appropriate, and decide whether an investigation is required and, if so, what form it should take as well as the scope of the investigation. The Monitoring Officer may decide to take no further action if a disclosure is considered to be inconsequential, vexatious, if the subject matter of the disclosure cannot be properly determined, has not been made in good faith, or has already been properly investigated by Amey or another competent party. Decisions will be reported regularly to the Amey Executive Committee.

Some concerns may be resolved without the need for formal investigation and unless the Whistleblower has chosen anonymity, they may be invited to take part in any necessary discussions with the Monitoring Officer or a nominated representative.

If the Monitoring Officer determines that an investigation is required, then they will designate an appropriate investigator to investigate the matter further. Following this the investigator will, within a reasonable amount of time, contact the Whistleblower for an initial discussion in respect of the disclosure. The investigator will also provide to the Whistleblower:

- an acknowledgment that an investigation will be carried out
- an indication of how they propose to deal with the matter
- an estimate of how long the process will take
- confirmation that any investigation will, as far as practical, be carried out in the strictest confidence
- confirmation of the protection provided for the Whistleblower by this policy and
- confirmation that the investigator will keep them informed of progress.

Guidance for investigating officers can be found in a separate document entitled 'Procedure for Investigators.'

Completion of an Investigation

Following any investigation, the investigator will produce a formal report which will be provided to the Monitoring Officer alone. The Monitoring Officer will then decide what if any, further action is to be taken in respect of the report's findings. At this stage, the Monitoring Officer or a nominated representative will inform the Whistleblower of the completion of the investigation together with a summary of the investigation. The investigation report remains the confidential property of Amey and will ordinarily not be made available to the Whistleblower or other parties.

If, after following the procedure outlined above, the Whistleblower reasonably believes that appropriate action has not been taken, the Whistleblower may report the matter to the relevant proper authority (if applicable) and inform the Monitoring Officer/Whistleblowing Helpline accordingly. The Acts set out a number of regulatory bodies to which qualified disclosure may be made. For example, these include:

- HM Revenue & Customs
- Financial Conduct Authority
- Health & Safety Executive
- The Information Commissioner
- Environment Agency
- Police

On the conclusion of an investigation any recommended actions will be agreed with a relevant Amey Executive Team member and issued to an agreed Amey Manager who will be responsible for ensuring that all actions are completed, or if not fulfilled provide mitigation why it has not been concluded, within an agreed timescale. These actions will be logged and managed through the Head of Investigations. All outstanding actions will be reviewed on a monthly basis by the Monitoring Officer, Head of Investigations and the Corporate Services Director.

Review

The Monitoring Officer, Head of Investigations and the Corporate Services Director shall meet monthly to discuss ongoing investigations, implementation of actions and analyses of trends. The Monitoring Officer shall meet on a monthly basis with the General Counsel to discuss such matters.

Whistleblowing updates shall also be given at appropriate times to the Amey Executive Committee, the Amey Board and the Audit Committee.

Communication and Training

The policy will be communicated at regular intervals, using a range of appropriate media to ensure that Employees and others are made aware of this policy and that they are encouraged to report malpractice or wrongdoing.

Regular training to all Employees will be conducted through the Compliance Training Programme. Appropriate measures will be put in place and monitored for joint venture partners, advisers and agents and all suppliers used by Amey.

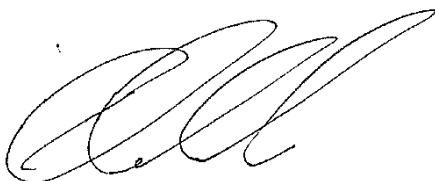
Implementation

The General Counsel is responsible for the implementation of this policy and other related policies and procedures, including the communication and detailed interpretation, monitoring, review and updating, training requirements and any disciplinary action in response to an apparent breach of this policy. The Director of Corporate Compliance shall be responsible for the day to day implementation and monitoring of the policy on behalf of the General Counsel.

Line management is responsible for implementation of this policy.

This policy should be read in conjunction with a number of other Amey policies on related matters, including but not limited to:-

- The Amey Code
- Anti-Fraud Policy
- Anti-Corruption Policy
- Disciplinary Policy



Andrew Milner

Chief Executive

October 2025

Revision status

REVISION	DATE	AMENDMENT	CONTENT OWNER	MANDATED BY
0.0	2/06/10	Final draft	M Cadger	M Bradshaw
1.0	31/08/10	New Policy	M Cadger	M Bradshaw
1.1	July 11	Reviewed & updated	M Cadger	M Bradshaw
1.2	5/07/12	Update to contact fax no	M Cadger	K Litton
1.3	23/07/13	Re-formatted & updated with legislation changes	M Cadger	K Litton
1.4	8/12/13	New doc ref	M Cadger	K Litton
1.5	11/11/2014	Signatory removed	T Fitchett	K Litton
1.6	April 2015	Reviewed & updated including dovetailing with new Code of Ethics.	P. Theobald	W. Robertson
1.7	30/6/2016	Reviewed and updated. Equality Impact Assessment completed.	P. Birch	W. Robertson
1.8	01/04/2017	Updated Whistleblowing details due to provider change as of 1 st April 2017	P Birch	W.Robertson
1.9	17.05.2017	Mandator changed to Jayne Bowie	Paul Birch	Jayne Bowie
2.0	30.06.2017	Annual review. Minor changes to content	Paul Birch	Jayne Bowie
2.1	12.07.2017	Updated Whistleblowing number in Appendix	Paul Birch	Jayne Bowie
2.2	02.11.2018	Annual review. No changes to content.	Paul Birch	Jayne Bowie
3.0	20.03.2020	Review and update. Minor changes to content	Paul Birch	Jayne Bowie
3.1	24.01.2023	Updated to reflect change of Chief Executive	Paul Birch	Jayne Bowie
3.2	01.08.2023	Updated to reflect the new company branding	Paul Birch	Jayne Bowie
4.0	20.10.2025	Review and update. Minor content changes	Paolo Steffenini	Jayne Bowie

Appendices

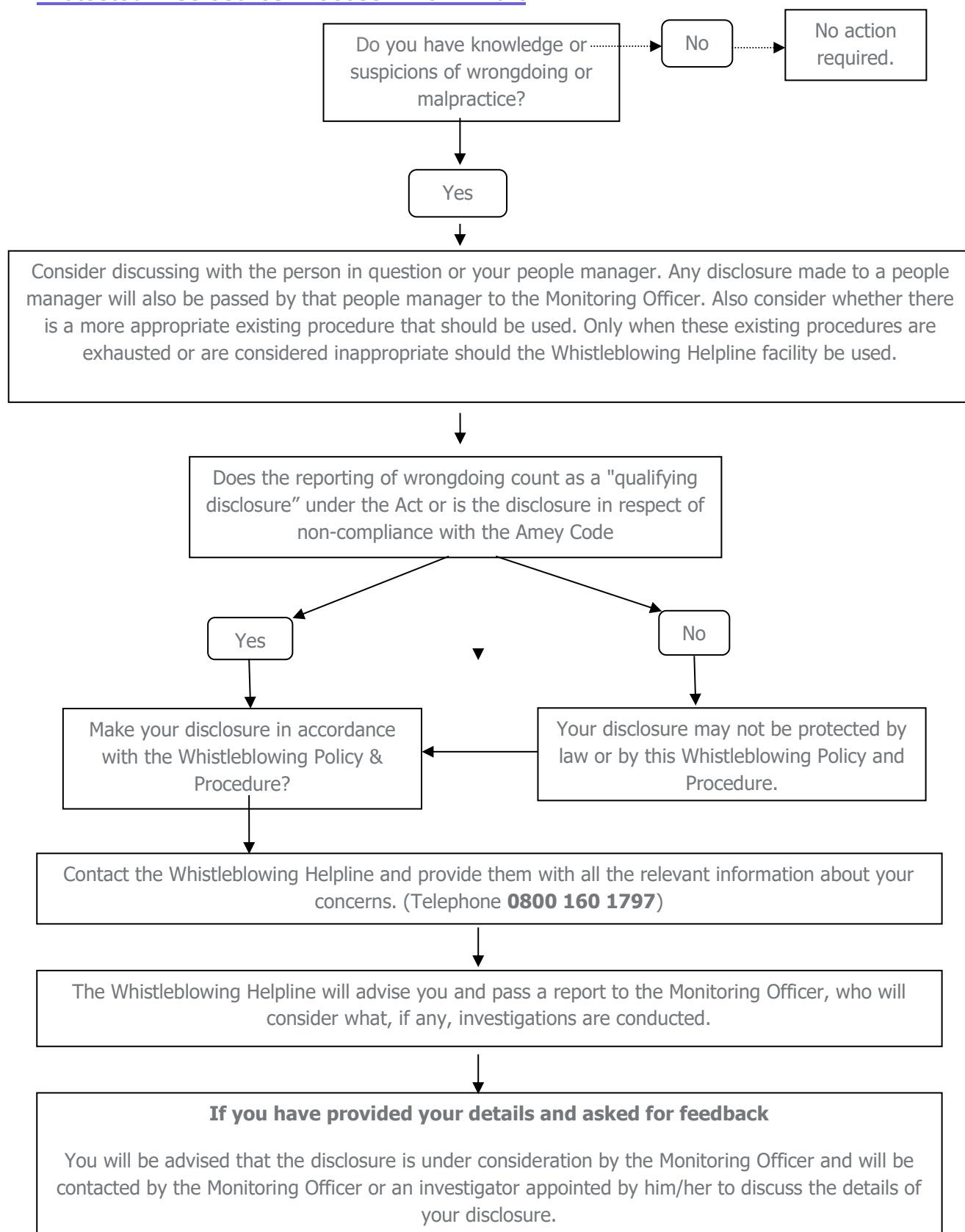
Appendix 1 – Protected Disclosures Process – Flow Chart

Appendix 2 – Whistleblowing Referral Form (For use by Whistleblowing Helpline)

Appendix 3 – Whistleblowing Referral Form (For use by people managers and other managers)

Appendix 1

Protected Disclosures Process - Flow Chart



Appendix 2

Whistleblowing Referral Form (For use by Whistleblowing Helpline)**[STATEMENT TO BE READ OUT BEFORE COMMENCING TO TAKE DETAILS OF CALL**

This service is provided in line with Amey's Whistleblowing Policy & Procedure and Code of Ethics. These documents are available on the Amey intranet or from the Amey HR helpdesk. Legislation and the Amey Whistleblowing Policy & Procedure guarantee that a caller making a valid protected disclosure will not be victimised in anyway. In order to assist Amey to investigate the matters fully, please can you give as much information as possible about your complaint. A failure to give sufficient information may make it difficult for the company to fully investigate your complaint.]

This form should be completed immediately when you receive a Whistleblowing call/disclosure. The form should be emailed to the General Counsel, Jayne Bowie, Group Legal Director (**Jayne.Bowie@amey.co.uk**) and her nominee Paul Birch, Corporate Services Director (**Paul.Birch@amey.co.uk**). In the absence of Jayne Bowie an e-mail should also be sent to Amey Monitoring Officer, Paolo Steffenini, Director of Corporate Compliance (**Paolo.Steffenini@amey.co.uk**) by PRIVATE outlook.

Legislation gives protection from victimisation or other unfair treatment to workers who disclose to their employer instances of malpractice within the business. You must not disclose the details of the individual or the disclosure to anyone unless authorised by the Amey Monitoring Officer or his nominee.

If the Whistleblower chooses to remain anonymous, it is recognised that this contact will be the only opportunity available to secure information from them. For this reason, the recipient of the call should extract as much information as possible from the caller by seeking detailed facts relating to any allegation. It is important that the Whistleblower is asked each of the questions below but this framework should not inhibit the recipient of the call asking additional questions to optimise the information gained.

Date and time concern reported:	Name of caller (if given):
Method of contact (i.e. letter/telephone/meeting)	Contract and depot/office/location:
Contact telephone number/email address of caller:	Does the caller require feedback? - If yes, feedback will be provided by the Monitoring Officer or his/her nominee under the Amey Whistleblowing Policy &

	Procedure, [Statement to be made to caller: In certain circumstances Amey may be prevented from sharing certain information concerning its investigation or the outcome]. Please provide your contact details:
Who is the caller's people manager?	
Has the caller discussed this matter with his/her people manager in accordance with the Amey Whistleblowing Policy & Procedure?	
If not, why? – Please give reasons:	
Details of concern raised: (provide as much detail as possible).	
Has the discloser discussed this with anyone else?	
Details of person referring disclosure to the Monitoring officer.	
Name:	
Contact Number:	
Date and time of referral to Monitoring Officer:	

Appendix 3

Whistleblowing Referral Form (For use by Amey people managers and other managers)**STATEMENT TO BE READ OUT BEFORE COMMENCING TO TAKE DETAILS OF A DISCLOSURE**

This record is made in line with Amey's Whistleblowing Policy & Procedure and Code of Ethics. These documents are available on the Amey intranet or from the Amey HR helpdesk. Legislation and the Amey Whistleblowing Policy & Procedure guarantee that an employee making a valid protected disclosure will not be victimised in anyway. In order to assist Amey to investigate the matters fully, please can you give as much information as possible about your complaint. A failure to give sufficient information may make it difficult for the company to fully investigate your complaint.

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Legislation gives protection from victimisation or other unfair treatment to workers who disclose to their employer instances of malpractice within the business. You must not disclose the details of the individual or the disclosure to anyone unless authorised by the monitoring Officer or his nominee.

Date and time concern reported:	Name of discloser (if given):
Method of contact (i.e. letter/telephone/meeting)	Contract and depot/office/location:
Contact telephone number/email address of caller:	Does the caller require feedback? - If yes, feedback will be provided by the Monitoring Officer or his/her nominee under the Amey Whistleblowing Policy & Procedure, [Statement to be made to caller: In certain circumstances Amey may be prevented from sharing certain information concerning its investigation or the outcome]. Please provide your contact details:

Who is the discloser's people manager?	
Has the discloser discussed this matter with his/her people manager in accordance with the Amey Whistleblowing Policy & Procedure?	
If not, why? – Please give reasons:	
Details of concern raised: (provide as much detail as possible).	
Has the discloser discussed this with anyone else?	
Details of person referring disclosure to the Monitoring officer.	
Name:	
Contact Number:	
Date and time of referral to Monitoring Officer:	