Whistleblowing Policy

Scope:

This Whistleblowing Policy (the **Policy**) applies to Brown & Mason Group Limited (**Brown & Mason**).

Brown & Mason are committed to conducting business in an open, honest and ethical way, and we believe our stakeholders have a right to expect Brown & Mason to comply with our legal responsibilities ethically.

Brown & Mason accepts responsibility under the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996 to:

- Encourage you to feel confident in raising serious concerns and to question and act upon your concerns;
- Provide a way for you to raise those concerns;
- Reassure you that if you raise a concern in good faith and reasonably believe them to be true, you will be protected from reprisal or victimisation;
- Take disciplinary action against anyone who destroys or conceals malpractice.

Whistleblowing Description:

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities.

The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

Examples of wrongdoing or dangers that might be reported by whistleblowing include:

- The commission of a criminal offence, for example fraud
- Someone's health and safety being in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- Breach of legal or professional obligations
- Circumstances where you believe someone is covering up a wrongdoing
- Circumstances where you have concerns about a potential breach of competition law

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future, by following this procedure.

Complaints that do not count as whistleblowing

This Policy does not cover personal/private grievances or complaints (such as bullying, harassment or discrimination) of individuals. If you have any such concerns in relation to your employment, please speak to HR or your line manager. It may be appropriate to follow the grievance procedure in such circumstances.

How to raise a concern

We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact:

- in relation to any competition law matters, Adam Collinson, Non-Executive Director
- in relation to any other matters, Alex Hadden, SHEQ Director

Contact details are at the end of this Policy.

If you raise a concern, we will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this Policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this Policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

External disclosures

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

Protect operates a confidential helpline. Their contact details are at the end of this Policy.

Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform Alex Hadden immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Contacts

For competition law matters Adam Collinson (Non-executive Director)	+44 (0)7475 430502 adam.collinson@brownandmason.com
For all other matters Alex Hadden (SHEQ Director)	+44 (0)1322 277731 alex.hadden@brownandmason.com
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk



Alex Hadden
SHEQ Director

Policy to be reviewed no later than 1 May 2027