

# Whistleblowing Policy

**Issue date: 1 December 2025**

Version 3.2



## What is this?

A guide to help you understand our Whistleblowing policy and how to report an issue.

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## Who does it apply to?

This Code applies to everyone acting for or on behalf of NCC Group:

- The Board of Directors has overall responsibility for ensuring the policy is applied
  - The Audit Committee is responsible for ensuring all whistleblowing instances are investigated
  - The Executive Committee is responsible for ensuring all colleagues understand and comply
  - All colleagues are responsible for understanding the principles outlined in this policy and for reporting appropriate concerns using the methods outlined in the policy
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## What are the key points?

- We will deal responsibly and professionally with any genuine concern about any wrongdoing in the workplace
  - Colleagues can raise concerns with their line manager or a number of senior leaders within the business
  - If colleagues are not comfortable reporting an issue internally we operate an anonymous and confidential whistleblowing helpline
  - Colleagues will not receive any detrimental treatment as a result of raising genuine or reasonable concerns
  - Whistleblowers will be kept informed of progress in addressing their concerns
  - Any issues raised will be subject to a fair and proper investigation, the results of which will be reported to the Audit Committee.
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## What action should I take?

Read the policy to understand how you can raise concerns either internally or externally. Talk to your line manager if there are any aspects of this you do not understand or email [compliance@nccgroup.com](mailto:compliance@nccgroup.com)

# Introduction

NCC Group is committed to maintaining the highest standards of honesty, integrity, openness and accountability. It recognises that colleagues, contractors, and other workers have an important role to play in achieving this goal and we expect everyone acting for or on behalf of NCC Group to maintain our high standards.

The Group will deal responsibly and professionally with any genuine concern about any wrongdoing in the workplace.

The objectives of this policy are:

- To encourage colleagues to raise genuine concerns about suspected wrongdoing at the earliest practical stage, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide colleagues with guidance as to how to raise those concerns.
- To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken/

All managers are expected to operate an ‘open door’ policy and should therefore make themselves available, either personally or by telephone or email, to resolve issues or concerns.

## Related and referenced documents

This policy should be considered alongside other policies that we have in place to support and guide us.

Policy / Document name
Code of Ethics
Anti-Bribery and Corruption Policy
Gifts and Hospitality Policy
Health and Safety Policy
Environmental Policy
Supplier Code of Conduct

All policies are available for colleagues to view on the [Global Governance Hub](#).

Global policies are supported by a variety of local or regional policies, which, in specific circumstances, may take precedence.

# Contents of this policy

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## Whistleblowing

Whistleblowing is the disclosure of information relating to suspected past, present, or likely future wrongdoing falling into one or more of the following categories:

- Criminal offences (this may include, for example, types of financial impropriety such as fraud)
- Failure to comply with an obligation set out in law
- Miscarriages of justice
- Endangering of someone's health and safety
- Damage to the environment
- Covering up wrongdoing in the above categories.

A whistleblower is a person who raises a concern in good faith relating to the above. If colleagues have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) they should report it under this policy.

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 such cases you should use the Grievance Procedure, Harassment Policy or Equal Opportunities Policy.

If you are uncertain whether your concerns fall within the scope of this policy, you should seek advice from the Chief People Officer or the Group General Counsel.

To achieve the highest standard of operations we ask all colleagues to uphold values of honesty, integrity, and quality. The relationships we have with each other, and our external stakeholders, are important and we must always treat any relationship with respect.

Everyone has a responsibility for ensuring we continually meet these high standards. Here's how we expect the code to work in practice:

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## How to raise a concern

### Internally

Colleagues should normally raise any concerns with their immediate manager either verbally or in writing. However, the most appropriate person to contact to report a concern may depend on the sensitivity of the issues involved and who is suspected of the malpractice.

Where colleagues prefer not to raise concerns with their manager for any reason, or where they feel that their line manager has not addressed their concern, they should contact one of the following:

- The Executive Director responsible for their business area
- The Chief People Officer
- SVP, Global Governance, Estates & Procurement
- The Group General Counsel
- The CFO
- The CEO

### External hotline

If colleagues do not feel able, or comfortable raising concerns internally, they can use an anonymous confidential reporting line as set out below. While the issue will be passed to the Chief People Officer, SVP, Global Governance, Estates & Procurement and Group General Counsel for review and any appropriate action, it will be done anonymously unless the person reporting is happy to be named.

Our confidential external hotline is with Safecall. The telephone numbers relevant to specific locations are provided below. Alternatively, Safecall can be contacted by sending an email to [nccgroup@safecall.co.uk](mailto:nccgroup@safecall.co.uk) or by filing a report via the Safecall website at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

Once a concern has been logged with Safecall, they will refer this matter to the Chief People Officer, SVP, Global Governance, Estates & Procurement or Group General Counsel unless the concern relates to these individuals, in which case the matter will be referred to the Company Secretary.

While individuals will not be expected to prove the truth of allegations, it will be necessary to demonstrate to the person contacted that there are sufficient grounds for concern. Malicious reports, or those made for personal gain may result in disciplinary action

### Our response

When a whistleblower raises a concern, the Company will carry out an initial assessment to determine the scope of any investigation.

All matters raised under this policy will be reported to the NCC Group Audit Committee for review.

The Company will aim to keep the whistleblower informed of the progress of any investigation into the issue they have raised. If the whistleblower is not happy with the way in which their concern has been handled, they should raise this concern with one of the key contacts noted above.

### Safeguards

Colleagues will not receive any detrimental treatment because of raising genuine or reasonable concerns, which are expressed in appropriate terms. Where a whistleblower believes that they have suffered any such treatment, they should inform the Chief People Officer or Group General Counsel.

All colleagues should feel able to voice whistleblowing concerns openly under this policy. Where practicable, whistle-blowers will not be identified as the person who raised the concern unless they consent in writing or there are grounds to believe that the report is malicious.

While all practical steps will be taken to avoid disclosing a whistleblower's identity, in some circumstances it may, inevitably, be possible for this to be deduced and confidentiality cannot be guaranteed.

Colleagues who are concerned about possible reprisals if their identity is revealed should come forward to the Chief People Officer, Group General Counsel, or one of the other key contacts listed above, and appropriate measures can be taken to preserve confidentiality to the extent that this is possible.

### **Safecall telephone numbers**

You can report a whistleblowing concern to Safecall on our confidential external hotline on the telephone number relevant to your location as stated below:

Australia	0011 800 72332255
Belgium	00 800 72332255
Canada	1877 59 98073
Denmark	00 800 72332255
Germany	00 800 72332255
Japan	0120 921067
Lithuania	00 800 72332255
Philippines	1800 1441 0499
Netherlands	00 800 72332255
Portugal	00 800 72332255
Singapore	800 4481773
Spain	00 800 72332255
Sweden	0850 252 122
Switzerland	00 800 72332255
UAE	8000 4413376
UK	0800 9151571
USA	1 866 901 329

### **How we communicate**

Our Whistleblowing Policy is made available to any person (permanent or interim) joining NCC Group. Internally, colleagues can access a copy of the latest copy via the Global Governance Hub. Externally, it is available from our Group website: [www.nccgroupplc.com](http://www.nccgroupplc.com)

### **Keep the policy relevant**

Keeping the policy relevant We review and update this policy regularly. Any changes will be communicated to line managers to brief colleagues, as well as follow up by email to all colleagues. and to all line managers.

Where relevant, the Works Council will be consulted regarding any changes to this policy.

The NCC Group plc Board approves any version of the code prior to publishing.

### **Security and confidentiality agreement**

The nature of this document is subject to the security requirements of NCC Group. Ownership and responsibility for this document remains that of the Compliance department.