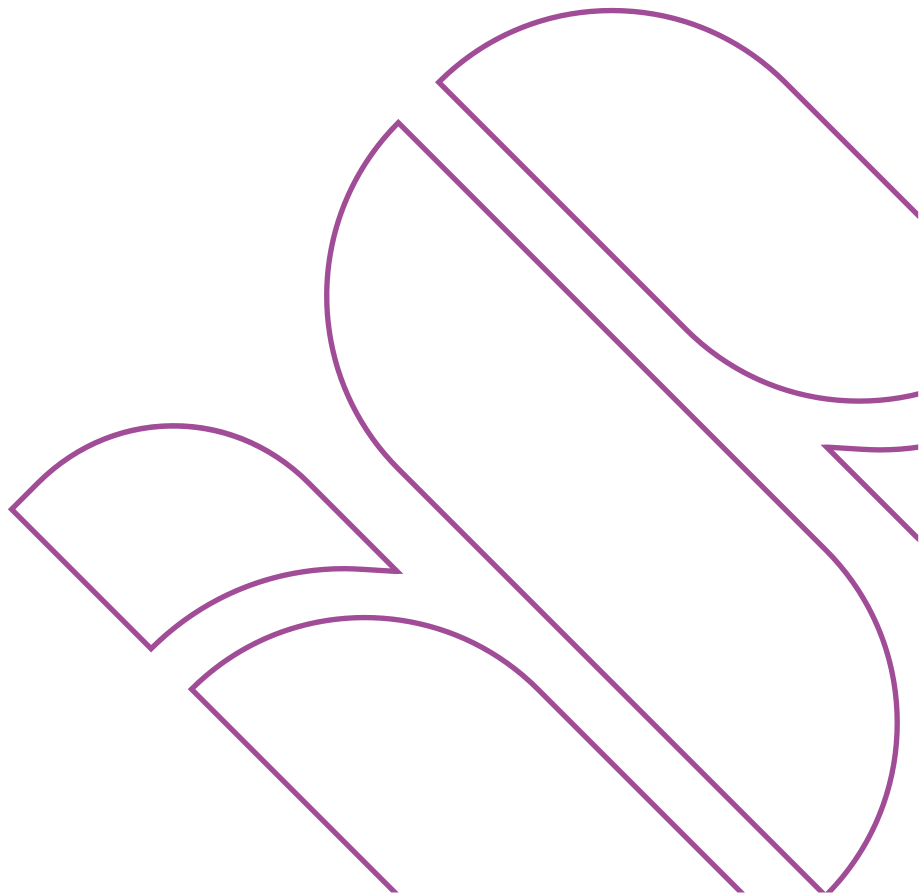


Sureserve

Whistleblowing Policy 2026





1. Introduction

Sureserve Group is committed to conducting business with integrity, transparency, and accountability. We encourage a culture of openness where employees and stakeholders feel confident to raise concerns about suspected wrongdoing, unethical behaviour, or breaches of laws and company policies without fear of retaliation.

Whistleblowing plays a critical role in identifying and addressing issues at an early stage, helping to protect our people, operations, and reputation. Concerns may relate to matters such as fraud, health and safety risks, environmental breaches, or any conduct that falls short of our expected standards.

This policy sets out the framework for raising concerns, the protections in place for whistleblowers, and how reports will be handled fairly and confidentially. It ensures that all reports are taken seriously and investigated appropriately, reinforcing our commitment to ethical and responsible business practices.

2. Purpose

The purpose of this policy is to provide a clear and accessible framework for raising concerns, ensuring they are handled properly, confidentially, and without fear of detriment. It sets out the protections available to whistleblowers, the process for reporting concerns, and how Sureserve will respond through fair and thorough investigation. This policy supports compliance with legal obligations and reinforces our commitment to maintaining the highest standards of ethical and responsible business conduct.

This policy sets out clear expectations, responsibilities, and reporting procedures to ensure concerns are addressed appropriately and to safeguard our people, operations, and ethical standards.

3. Scope

This policy applies to:

- **Sureserve Group Limited** (Company number 09411297) and all its subsidiaries incorporating:
 - **Compliance:** Compliance Holdings Ltd, Sureserve Compliance Central Ltd, Sureserve Compliance Fire Ltd, Compliance North Ltd, Sureserve Compliance Northwest Ltd, Sureserve Compliance South Ltd, Sureserve Compliance Water Ltd, Swale Heating Ltd.
 - **Energy Services:** Sureserve Energy Holdings Ltd, Sureserve Energy Services Public Buildings Ltd, Sureserve Energy Services Meters Ltd, Sureserve Energy Services North Ltd, Sureserve Energy Services UK Ltd, Hillside-Infinitas Ltd, Sureserve Energy Services South West, Sureserve Energy Services Wales Ltd
 - **Electrical:** Sureserve Compliance Electrical Holdings Ltd, Purdy Contracts Ltd, R. Dunham (UK) Ltd, Sureserve Compliance Electrical North Ltd.
 - **International:** Bonarius Vastgoed B.V.
- All employees, contractors, agency workers, and directors
- All operations, services, offices, sites, and projects delivered on behalf of clients
- Our supply chain, including those working for our suppliers.

To see our full company structure including all entities covered by this policy please visit: [Sureserve Structure Chart - Sureserve](#)

4. What is Whistleblowing?

A Whistle Blower is someone who discloses information to their Employer or to the relevant authorities about a legitimate concern which relates to some danger, illegal or unethical conduct in the workplace.



The law recognises that Whistle Blowing occurs and it protects staff who are Whistle Blowers from suffering detrimental treatment or from being unfairly dismissed as a result. To be protected by the legislation a Whistle Blower must fall within the stringent legal rules. Anyone who makes a disclosure which they do not reasonably believe is in the public interest will not be protected.

5. Our approach

Sureserve seeks to conduct its business honestly and with integrity at all times. It is the Company's policy to ensure that at every level of management our business is conducted in such a way as to comply with all legal requirements that govern our activities. However, we acknowledge that all businesses face the risk of their activities going wrong from time to time or of unknowingly harbouring malpractice.

We believe we have a duty to take appropriate measures to identify such situations and to attempt to remedy them. By encouraging a culture of openness and accountability, we believe we can help prevent such situations occurring.

Open reporting is to be encouraged, and it is a cornerstone of this Policy that staff should be comfortable in bringing any concerns forward in the secure knowledge that they will be taken seriously and provided disclosures are made in good faith, there will be no adverse repercussions.

There is no reason for any staff member to believe that he or she will suffer a detriment for speaking up if they believe that something is wrong or that if we are alerted to it we will conceal or destroy evidence.

Any member of staff who raises a legitimate concern under this Policy will not be at risk of losing their job or suffering any form of retribution as a result. Staff must not threaten or retaliate against Whistle Blowers in any way. Anyone involved in such conduct may be subject to disciplinary action.

It is important to the Company that any misconduct or wrongdoing by workers is reported and properly dealt with. It is the responsibility of all staff members to raise any concerns they might have about malpractice within the workplace. The Company therefore encourages all staff to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This Policy sets out the way in which staff may raise their concerns and how those concerns will be dealt with by the Company.

Alternatively, the staff member may wish to bring a complaint using the normal Grievance Procedure set out in the Employee Handbook.

6. Qualifying Disclosures

The Public Interest Disclosure Act 1998 (the "Act") protects Whistle Blowers from suffering detriment in employment and makes dismissal for having made certain disclosures automatically unfair. There is no qualifying period of employment for this protection.

Members of staff who raise legitimate concerns about specified matters are protected under the Act. Specified matters are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a member of staff who has a reasonable belief that:

- A criminal offence has been committed, is being committed, or is likely to be committed.
- A person has failed, is failing, or is likely to fail to comply with a legal obligation.
- A miscarriage of justice has occurred, is occurring, or is likely to occur.
- The health and safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- Information tending to show any matter falling within any one of the above categories has been; is being or is likely to be deliberately concealed.

It is not necessary for a staff member to have proof that such an act is being, has been or is likely to be



committed - a reasonable belief is sufficient, even if that belief later turns out to be wrong. Staff members have no responsibility for investigating the matter. It is the Company's responsibility to ensure that an appropriate investigation takes place.

If you have a complaint relating to your personal circumstances in the workplace, then you should use the normal Grievance Procedure set out in the Employee Handbook.

7. Protected Disclosures

In order to qualify for protection, there are specified methods of disclosure, or procedures, which the staff member must have followed in order to disclose one of the above matters. The Company encourages staff to raise their concerns under the procedure outlined in this Policy. The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing. It is therefore hoped that it will not be necessary for staff to alert external organisations.

A qualifying disclosure is protected if it is made to the Company under the terms of this Policy or to another person, other than the Company, whom the staff member reasonably believes to be solely or mainly responsible for the relevant failure.

A staff member who raises a genuine allegation which turns out to be false will be protected. However, a staff member who raises an allegation which they know or suspect to be false will not be protected.

8. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this Policy. When staff members raise a concern under this Policy, the Company will endeavour not to reveal their identity without their consent first being obtained or unless required by law. If the situation arises where the Company is not able to resolve the concern without revealing the staff member's identity, they will generally be consulted on how to proceed.

Completely anonymous disclosures are difficult to investigate as the Company might not be able to look into the allegations and assess whether they are credible, to protect the staff member's position, or to give them feedback. Members of staff should remember that the Company owes a duty of fairness to all staff members, including those suspected of wrongdoing.

Whistle Blowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contact points listed in the Contacts and appropriate measures can be taken to maintain confidentiality. If there is an unauthorised disclosure of a Whistle Blower's identity under this Policy, disciplinary action may be taken. If a staff member is in doubt they are advised to seek guidance from one of the listed Contacts.

8. Disclosure Procedure

This procedure applies to all staff.

8.1 How to raise a concern

In the event of a staff member wishing to make a qualifying disclosure, he or she should follow the steps below:

- He or she should, in the first instance, report the situation to his or her Manager. If the staff member does not wish to speak to their Manager, they can instead speak to an alternative Manager, or the Company's Whistleblowing Officer. Alternatively, they can raise a concern with one of the Company's Senior Managers. The Company has a confidential whistleblowing line, whistleblower@sureservegroup.co.uk. This line may be contacted anonymously.



- The disclosure may be made in writing or verbally, in which case the Manager or relevant person should record details of the concern raised in writing and provide the staff member with a copy. Such disclosures should be made promptly so that investigation may proceed and any action taken expeditiously.

8.2 Dealing with the staff members concern

All qualifying disclosures will be treated seriously. The disclosure will be promptly and fairly investigated. We will arrange a meeting with the staff member as soon as possible to discuss the concern. The staff member may bring a colleague or Trade Union Representative to any meetings under this Policy. We expect both the Whistle Blower and their companion to respect the confidentiality of the disclosure and any subsequent investigation.

Once the staff member has raised a concern, the Company will carry out an initial assessment to determine the scope of any investigation. The staff member may be required to attend additional meetings in order to provide further information.

The staff member will be informed in writing of the general outcome in a timely manner. However, the need for confidentiality may prevent the Company from giving the staff member specific details of the investigation or actions taken.

8.3 Actions to be taken

Once the Company's conclusions have been finalised; any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. The Company will endeavour to inform the staff member if a referral to an external agency is about to or has taken place, although the Company may need to make such a referral without the staff member's knowledge or consent if this is appropriate in the circumstances. The Company will also review and implement any recommendations for change to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. If no action is to be taken, the reasons for this will be explained to the staff member.

8.4 If the staff member is not satisfied

The staff member will be notified in writing of his or her right to appeal against the Company's decision if he or she is not satisfied with it. The staff member can also raise it with one of the other key Contacts listed at the bottom of this policy. The Company is committed to taking appropriate action with respect to all qualifying disclosures which are upheld.

If the staff member wishes to appeal against the Company's decision, he or she must appeal in writing to a more Senior Manager or to a Director of the Company within five working days of the Company's decision. On receipt of such a request, a more Senior Manager or a Director (who may not be the person to whom the staff member addressed their appeal) shall make arrangements to hear the appeal at an appeal meeting. Following the meeting, the relevant Senior Manager or Director will inform the staff member in writing of the Company's final decision on the staff member's appeal.

If, on conclusion of the above stages, the staff member reasonably believes that appropriate action has still not been taken, the staff member may then report the matter to the proper authority. The Act sets out a number of prescribed external bodies or persons to which qualifying disclosures may be made. These include HM Revenue & Customs, the Financial Conduct Authority, the Office of Fair Trading, the Health & Safety Executive and the Environment Agency.

9. Responsibilities

All members of staff are responsible for understanding the standards of ethical behaviour expected at the



Company. Any genuine concerns should be disclosed as quickly as possible using the Disclosure Procedure.

Managers, Senior Managers, and Directors are responsible for:

- ensuring all members of staff are made aware of this Policy;
- creating an environment in which it is easy to discuss a concern about unethical behaviour;
- taking seriously and dealing sensitively with any concern raised;
- logging all concerns raised with Human Resources;
- notifying the Chief Financial Officer or Anti-Corruption Officer at the earliest opportunity if the concern involves possible fraudulent activity. This will enable them to assess whether the matter is serious enough to warrant an investigation under the Company's Anti-Corruption Policy;
- investigating concerns thoroughly and making an objective assessment of the concern;
- seeking advice when necessary;
- keeping the staff member advised of progress, where appropriate; and
- completing an Investigation Summary Report.

Human Resources are responsible for:

- providing advice to staff members and managers on the application of the Policy;
- monitoring the effectiveness of the Policy and process;
- maintaining a restricted access Whistle Blowing register and associated records;
- providing regular updates to the Sureserve Group Board;
- supporting managers to ensure compliance with his or her obligations in respect of this Policy; and
- conducting a review of this Policy from a legal and operational perspective once every year.

It is important that you tell your line manager, a Director or contact the confidential whistleblowing line as soon as possible if you are offered a Bribe by a Third Party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

All matters will be dealt with, where applicable, in strict accordance with the terms of the Public Interest Disclosure Act 1998, which protects Employees who raise matters in the public interest.

The Sureserve Group Board has overall accountability for environmental performance. Senior management is responsible for implementing this policy and ensuring adequate resources are in place. ESG, SHEQ and operations teams have day-to-day responsibility for delivering environmental compliance, reducing impact, monitoring and reporting progress. All employees and contractors are responsible for complying with this policy and relevant procedures.

10. General Principles

Staff members should be aware of the importance of eliminating fraud or wrongdoing at work. They should report anything they become aware of that is illegal.

Staff members will not be victimised, subjected to a detriment or dismissed for raising a genuinely held concern under this Policy, even if their disclosure is not upheld.

Staff members who victimise or retaliate against those who have raised concerns under this Policy will be subject to disciplinary action.

If an investigation under this Policy concludes that a disclosure has been made other than in accordance with this Policy, the Whistle Blower may be subject to disciplinary action.

Covering up someone else's wrongdoing is a disciplinary offence. A staff member should never agree to remain silent about a wrongdoing, even if told to do so by a person in authority such as a Manager. They should report the matter to one of the persons listed in the Contacts below or an outside body in line with this Policy.



11. Contacts

Whistleblowing Officer	Group Legal Director
The Company's confidential reporting hotline	whistleblower@sureservegroup.co.uk

12. Policy Review

This policy will be reviewed annually or sooner if required by changes in legislation, client requirements, or organisational priorities.

Approved by:

A handwritten signature in blue ink, appearing to read 'G Mayhill', written in a cursive style.

Geoff Mayhill
Group Legal Director
22nd June 2026

