

Whistleblowing Policy

Version 1.2 A Young 06/04/2026

POLICY STATEMENT

The Company encourages a free and open culture in dealings between its managers, employees and all people with whom it engages in business and legal relations. In particular, this organisation recognises that effective and honest communication is essential if concerns about breaches or failures are to be dealt with effectively and the organisation's success ensured.

This policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

Workers who, in the public interest, raise genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

SCOPE

This policy applies to all employees, contractors, board members, and any other individuals acting on behalf of Stonbury Ltd and Stonbury Holdings Ltd.

PROCEDURE

1. This policy will apply in cases where a worker genuinely believes that one of the following sets of circumstances is occurring, has occurred or may occur within the organisation and that it is in the public interest for the employee to disclose it. The matters that may be disclosed in this way are:

- a) the committal of a criminal offence
- b) engaging in bribery and corruption
- c) fraud
- d) a failure to comply with any legal obligation
- e) a miscarriage of justice
- f) a breach of health and safety rules causing danger to any individual
- g) damage to the environment

concealment of information tending to show any matter falling within any one of the preceding paragraphs.

2. There is no need for a worker to prove that the breach or failure that they are alleging has occurred or is likely to occur; a reasonable suspicion will suffice, ie where the worker reasonably believes that the information disclosed is substantially true. Workers should, however, note that they are not entitled to make a disclosure if in so doing they commit a criminal offence.

3. If a worker wishes to raise or discuss any issues which might fall into one of the categories listed in clause (1), they should contact a member of the People team via email (people@stonbury.co.uk). The team will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the worker who has made the disclosure may be required to attend an investigatory meeting. Appropriate steps will be taken to ensure that the worker's working relationships are not prejudiced by the fact of the disclosure.

4. This policy also applies to any concerns of wrongdoing by third parties while acting on behalf of Stonbury, eg suppliers, subcontractors, agents or associates. If a worker reasonably believes that the

relevant failure (ie one of the set of circumstances listed above under clause (1)) relates wholly or mainly to the conduct of a person other than someone who works for Stonbury Ltd, then they should make that disclosure to that other person's employer.

Also, a worker may make such a disclosure to Protect, the leading authority on public interest whistleblowing, if they consider that it has an interest in the matter and, despite the best efforts of the organisation, the worker believes that disclosure within the organisation is inappropriate or has been unsuccessful. Disclosures made to workers' legal advisors in the course of obtaining legal advice will be protected.

5. Workers should be aware that the policy will apply where they reasonably believe that the information disclosed and any allegation contained in it are substantially true. If any disclosure concerns information which the worker does not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the organisation's disciplinary policy and procedures and may constitute gross misconduct for which summary dismissal is the sanction.

6. While the organisation hopes that such disclosures will never be necessary, it also recognises that circumstances may arise with which the organisation is unfamiliar. Each case will be treated on its own facts.

7. A worker who makes a disclosure is protected from detrimental treatment by the organisation, by a co-worker or by an agent of the organisation. An employer is vicariously liable for detrimental treatment. If this occurs, it should be raised immediately with the People Team so that the matter can be investigated thoroughly without undue delay. Detrimental treatment includes harassment and bullying or not complying with a person's rights and entitlements under their contract of employment.

8. A worker is also protected from dismissal by the organisation for making a protected disclosure.

MONITORING AND REVIEW

This policy will be monitored and subject to regular review by management to ensure that this works effectively both in the interests of the Company and the employee.

This policy will be reviewed annually.

APPROVAL

Signed by the Head of People



Adrian Young

Date 06/04/2026

To be reviewed annually or in the event changes to legislation, organisational changes or failures to the system being highlighted.