

# WHISTLEBLOWING POLICY

## Purpose

This policy provides a framework for all personnel and persons acting on behalf of the Company to flag operational concerns with the Management Team without fear of reprisal/retaliation, victimisation, or other disadvantage within the work environment.

This policy should be used in conjunction with (but not limited to):

- Anti-Slavery (Modern Slavery) policy
- Anti-Bribery policy
- Worksafe policy
- Ethical Trading policy
- Counterfeit Goods policy
- Drugs & Alcohol policy
- Equal Opportunity & Diversity Policy

The Company strives to maintain the highest standards of excellence within its operations.

Building a culture of behaving ethically and with integrity is of the utmost importance to the Company.

Damage to reputation can be costly.

The Company relies on every person who represents it to speak out when they have concerns.

Speaking out about damaging or potentially damaging behaviours, conduct, acts, or omissions enable appropriate resolution(s).

## Scope

This policy applies to all SCCS Survey Equipment Ltd personnel and persons acting on behalf of the Company.

The policy also applies to persons affected by the business operations of the Company (actions or omissions).

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Policy Reference:	013.6.2021.PL
Revision No:	3
Date of 1 <sup>st</sup> Issue:	19/11/2021
Date of Revision:	20/11/2023
Reviewed by:	Roz Wankling
Approved by:	Kevin Smith

## Commitment

The company is committed to:

- Facilitating a no fear environment for the reporting of suspected wrongdoing.
- Encourage personnel to feel confident in raising serious concerns at the earliest opportunity.
- Provision of a clear framework to personnel for the reporting of concerns.
- Operating to the highest ethical standards with complete integrity.
- Provision is suitable training to personnel that enables individuals to recognise inappropriate conduct and actions (such as fraudulent activity).
- Ensuring our supply chain adopt whistleblowing practices that mirror our own.

## Definitions

**“Company”** shall mean SCCS Survey Equipment Ltd

**“SCCS”** shall mean SCCS Survey Equipment Ltd

**“Management Team”** shall mean the Regional Director and such other senior personnel deemed appropriate.

## What can, or should, be reported?

If you have a concern that relates to your own treatment as an employee, you should raise this under existing grievance procedures which are outlined in your contract of employment.

If you are unable to find your contract of employment a copy of the Hexagon Geosystems UK group policy: Individual and Collective Grievance and Dispute Policy can be located in the CRL folder of the Company H drive. You can also request a copy from HR.

Typically, a report might be connected to (but not limited to):

- Anything that endangers the safety of SCCS personnel, visitors of the Company, or any other person who might reasonably be affected by the acts or omissions of any person employed by, or acting on behalf of, the Company.
- Any actions or omissions undertaken in the course of employment (or by persons acting on behalf of SCCS) that will, or may have the capacity to, damage the environment. An example might be illegal discharges of controlled substances into a water course.

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- Conduct which is an offence or breach of the law (both civil and criminal law). Examples might include theft (physical or intellectual rights) or deliberate damage to property.
- Failures to comply with any legal obligations applicable to the individual person and/or applicable to the Company within its business operations.
- Conduct which might damage the reputation of the Company.
- Dishonesty or unfairness when dealing with customers and/or suppliers.
- Financial malpractice (fraud, corruption, unauthorised access of funds or other assets).
- Victimisation, harassment, bullying or discrimination of a person on the grounds of (but not limited to) gender, race, marital status, disability, belief, age, or sexual orientation. Further details of the Company zero tolerance stance toward discrimination and victimisation can be found in its Equal Opportunities & Diversity policy.
- All other forms of victimisation, harassment, bullying or other improper behaviour.
- Breaches of human rights or acts of Modern Slavery. Further information regarding Modern Slavery can be found in the Company Anti-Slavery policy.
- Company conduct, within the marketplace, that would fall foul of the Company Anti-Bribery policy.
- Requests made to you as an individual to conduct business on behalf of the Company in a manner which you know not to be consistent with Company policy or to fall below established standards of practice.
- All other unethical conduct.
- Hiding evidence of misconduct or breaches set out above, or assisting others, in any of the breaches or conduct set out above.

If you are unsure what might constitute a wrongdoing, ask yourself the following questions:

- Could the Health & Safety of yourself or others be at risk?
- Could the environment be damaged by the conduct that concerns you?
- Might the conduct, acts or omissions be considered to be illegal?
- Is there a breach of Company policy and/or ethical codes of business practices?

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- Might the conduct result in loss of reputation and/or loss of business for the Company?
- Does the conduct feel wrong to you?
- Would you feel upset, angry, or uncomfortable to be at the receiving end of observed conduct you have witnessed?
- Do you feel uncomfortable with observed conduct/practices between personnel representing the Company and its customers and/or suppliers?

Who do you make a report to?

- For concerns which are to be addressed via Company grievance procedures please send your written grievance to HR and/or your line manager. The grievance must identify you (cannot be anonymous). It is recommended all communications are marked "HR Confidential".
- Health & Safety concerns should be initially flagged to the Company Health & Safety Manager. Mark your email "Confidential: Safety Concern". If you feel the concern may cause imminent injury or damage, then mark your email "Confidential: Safety concern imminent risk".
- Environmental concerns should be initially flagged to the Company Health & Safety Manager and Regional Director. Mark your email "Confidential: Environmental Concern". If you feel your concern may cause imminent environmental damage (such as a fire risk or possible damage to environment via discharge) mark your email "Confidential: Environmental concern imminent risk."
- All other concerns should be addressed in writing to the Management Team. Mark your written submission as "HR Confidential: Whistleblowing Report".
- In time critical emergency situations, the complainant may make a verbal submission to the Management Team and follow up in writing afterwards.
- In time critical emergency situations, the report can be made verbally and then recorded in writing afterwards.

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### Protection & Confidentiality

The Company is committed to good practices and will be supportive of any person raising any concern under the remit of this policy.

The Company will not tolerate any harassment, victimisation, reprisal, or similar conduct toward any person raising a concern under the remit of this policy.

The complainant will receive the benefit of full support from the Management Team and all concerns will be taken seriously (receiving full and proper investigation).

Concerns will be kept confidential, and all efforts extended to ensure your identity will be kept confidential.

There may be occasions where any following investigation may be difficult without your help (thus impacting on confidentiality).

In those circumstances you will be approached by the Management Team to discuss confidentiality implications further.

Complainants are asked to keep the details of submitted complaints confidential so that investigations are not compromised.

Personnel are encouraged to put their name to an allegation whenever possible.

If you do not reveal your identity to the Company, it may make it more difficult to investigate, protect your position, and give you feedback.

If you make an allegation in good faith (reasonably believing it to be true) that later on investigation is not founded, you will be protected from reprisal as set out before/above.

If you make an allegation frivolously, maliciously or for personal gain you may be subject to disciplinary action as set out within the terms of your contract of employment.

If you are not satisfied with how the Company deal with your concern, we would request you raise your concerns the Management Team.

If you remain unsatisfied you can contact ACAS <https://www.acas.org.uk> or the whistleblowing charity Protect <https://protect-advice.org.uk> for further guidance.

Details of government whistleblowing guidance can be found at <https://www.gov.uk/whistleblowing>

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### Compliance & Review

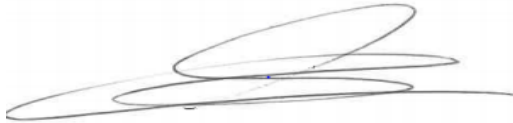
The Management Team will be responsible for managing the compliance with the remit of this policy.

The Management Team are responsible for managing corrective action resolution.

The Management Team are responsible for the appropriate review of the remit of this policy and its appropriateness of it to meet Company objectives and legal obligations.

All SCCS personnel are responsible for working as trained and in accordance with Company policies and practices.

**Signed:**



**Print name:** Kevin Smith

**Position:**

Regional Director UK

**Date:**

20<sup>th</sup> November 2023

**Revision**

3

**Next review:**

19<sup>th</sup> November 2024

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