

LAND RECOVERY

WHISTLEBLOWING POLICY

Introduction

This policy applies to all employees and officers of Land Recovery Ltd and Land Recovery Rail Ltd (from herein all references to Land Recovery Ltd will imply the same to Land Recovery Rail Ltd) Other individuals performing functions in relation to the organisation, such as agency employees and contractors, are encouraged to use it.

It is important to the business that any fraud, misconduct or wrongdoing by employees or officers of the organisation is reported and properly dealt with. The company therefore encourages all individuals 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 individuals may raise any concerns that they have and how those concerns will be dealt with.

Background

The law provides protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief that:

- Criminal activity.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Miscarriages of justice.
- Danger to health and safety.
- Damage to the environment.
- Financial fraud or mismanagement.
- Negligence.
- Conduct likely to damage our reputation or financial wellbeing.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of any of the above matters.

Is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be committed - a reasonable belief is sufficient.

Any employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

We actively encourage our employees to raise their concerns under this policy in the first instance. If an employee is not sure whether or not to raise a concern, they should discuss the issue with their Line Manager or the Land Recovery HR Manager.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this policy will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the employee who raised the issue.
- No employee will be victimised for raising a matter under this policy. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.

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- Victimisation of any employee for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this policy the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter in line with this policy.

This policy is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's grievance procedure.

Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and the company is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business at the earliest possible stage in accordance with this policy.

Protection

This policy is designed to provide guidance and offer protection to individuals who legitimately and properly disclose the types of concerns set out above (a "whistle-blower"). The company aims to encourage openness and will support employee who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you consider that you have been the subject of unfavourable treatment as a result of raising a whistleblowing concern, please speak to Land Recovery HR Manager immediately, whose contact details are set out below.

Whistle-blowers should not be threatened or retaliated against in any way for raising their concerns. Anyone involved in such conduct may be subject to disciplinary action.

Untrue Allegations

If an individual discloses information which is found subsequently not to be correct no action will be taken against the whistle-blower as long as the whistle-blower honestly and reasonably believed that the information and any allegation raised in it are substantially true. In making a disclosure the whistle-blower should exercise due care to ensure the accuracy of the information. If it is concluded that a whistle-blower has made a false allegation maliciously, the whistle-blower will be subject to disciplinary action.

Anonymous Allegations

The company encourages individuals to put their name to any disclosures they make. Proper investigation may be made more difficult or impossible if we cannot obtain sufficient information from you. It is also more difficult to establish whether any allegations are credible. Land Recovery Limited hopes that the protections set out above will give you the confidence not to raise concerns anonymously, so that they can be properly investigated.

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Confidentiality

Land Recovery Ltd will endeavour to treat all such disclosures made in accordance with this policy in a confidential and sensitive manner. The identity of a whistle-blower may be kept confidential so long as it does not hinder or frustrate any investigation. However, the whistle-blower may need to provide a statement as part of the evidence required.

Procedure

In the first instance, (unless you reasonably believe your Line Manager to be involved in the wrongdoing, or if for any other reason you do not wish to approach your Line Manager), any concerns should be raised with your Line Manager. If you believe your Line Manager to be involved, or for any reason does not wish to approach your Line Manager, then you can make a disclosure to:

Land Recovery HR Manager

Chanel Crocker

Chanel.crocker@lrl.uk.com

Investigations

We may arrange a meeting with you to discuss your concerns. 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.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with this matter.

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter and external advisers. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with a different contact set out above. Alternatively, you may feel it is necessary to make an external disclosure.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. Land Recovery Ltd hopes that in many cases concerns can be dealt with internally, however, 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 raise the concern internally where possible and seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline **((020) 7404 6609)**

www.pcaaw.co.uk

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The legislation also sets out a number of other bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs.
- The Financial Conduct Authority.
- The Competition and Markets Authority.
- The Health and Safety Executive.
- The Environment Agency.
- The Independent Office for Police Conduct; and
- The Serious Fraud Office.

Data protection

When an individual makes a disclosure, Land Recovery Ltd will process any personal data collected in accordance with our Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Signed:



Dan Beecroft

Title: Managing Director

Date: January 2024