

PURMO G R O U P

Purmo Group (UK) Ltd

Whistleblowing Policy Statement

Purmo Group (UK) Ltd is committed to the highest possible standards of operation, probity and accountability. In line with that commitment, employees and others with serious concerns about any aspect of the Company and its work are encouraged to come forward and voice those concerns without fear of reprisals. Employees have the right to raise concerns about the actions of other employees, private contractors, volunteers or Directors of the Company and the Company's Whistleblowing Policy is intended to encourage and enable employees to raise serious concerns rather than overlooking a problem.

The Company acknowledges responsibility to the Public Interest Disclosure Act 1998 and will not tolerate harassment or victimisation towards individuals who raise concerns relating to suspected wrongdoing or danger within the workplace. Purmo Group (UK) Ltd will take action to protect employees when they raise a concern in good faith and the Company's grievance procedure provides employees with guidance on how to raise a concern in this regard.

The Company hopes that employees feel able to voice whistleblowing concerns openly under the Whistleblowing Policy and will make every effort to protect an employee's identity if confidentiality is requested. A clear process exists for employees to "blow the whistle" and raise suspected wrongdoing or danger in the workplace. Employees raising a concern via the Whistleblowing Policy and Procedure are not expected to prove the truth of an allegation, however they are expected to demonstrate that there are sufficient grounds for concern. Examples of wrongdoing or danger in the workplace include, but are not limited to, criminal activity, danger to health and safety, damage to the environment, failure to comply with legal/professional obligations or regulatory requirements, bribery, financial fraud or mismanagement, negligence, breach of PGUK policies and procedures, conduct likely to damage the Company's reputation, unauthorised disclosure of confidential information or the deliberate concealment of any of these matters.

Any issues raised via the Whistleblowing process will be dealt with in a timely manner and a full and detailed investigation will be conducted, with appropriate action taken where necessary. In most cases, the employee will not need to speak to anyone outside of the legal entity, however where an employee is not satisfied with the local Company's response to their concerns, they can speak to the relevant person within the Purmo Group, as set out in the policy document. If an employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against that employee. If, however, any subsequent investigation concludes that an employee has made malicious allegations, or with a view to personal gain, disciplinary action may be taken against that employee.

The Company Directors and UK Leadership team shall take responsibility for implementing this policy statement and will ensure as far as is reasonably practical that employees feel able to raise concerns relating to wrongdoing without fear of reprisal and that they are protected from discrimination and/or victimisation when doing so.

This policy statement will be reviewed annually and updated as required.

Signed.....

Date..... 25TH FEB 2020.....

Mr Barry Lynch
Head of Legal Entity, Purmo Group (UK) Ltd