

# Speak Up Policy

headlam

“Lead by example, we are all leaders” is a Headlam value and we are committed to conducting business with integrity and fairness, with respect for the law and in line with our values.



**You are encouraged to speak up** if you suspect, observe or experience conduct or behaviour that concerns you or that appears to disregard our policies or procedures.

**We value the help of colleagues** who identify and speak up about potential concerns that need to be addressed.

## How to ‘speak up’

Send an email to:

[speakup@headlam.com](mailto:speakup@headlam.com)

Visit our website page:

[www.headlam.ethicspoint.com](http://www.headlam.ethicspoint.com)

Call (UK and Northern Ireland):

**0800 046 5406**

Call (France):

**0800 736 961**

Call (Netherlands):

**0800 0228 8156**



After you have raised a concern, **a designated person will arrange a meeting** to discuss your concerns in more detail.



# Speak Up Policy

<b>Purpose:</b>	Headlam is committed to supporting our colleagues to Speak Up when they observe, suspect or experience conduct which concerns them.
<b>Scope:</b>	<p>This policy applies to all employees of the Headlam group of businesses and all subsidiaries.</p> <p>This policy may also be used by agency workers or self-employed workers.</p>
<b>Group or UK Only:</b>	Group
<b>Issuing Department:</b>	HR
<b>Issue/Last Review Date:</b>	September 2024
<b>Date of Next Review (if applicable):</b>	September 2025

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## Introduction

### What is the Speak Up policy?

Here at Headlam we believe in doing what's right and supporting colleagues who spot something that doesn't look or feel right around them.

Sometimes situations arise which can cause concern, and we all have a responsibility to ask questions or speak up.

The Speak up policy explains how colleagues can raise concerns about potential misconduct or unethical behaviour in confidence. It outlines the options available to you, the processes and what to expect from Headlam if you use it. No one will ever suffer from raising a concern in good faith.

### Who can use the Speak Up Policy?

All colleagues at Headlam. Agency workers and self-employed workers are also welcome to use this, Policy.

### Why is speaking up important?

Headlam is committed to conducting business with integrity and fairness, with respect for the law and in line with our values. You are encouraged to speak up if you suspect, observe or experience conduct or behaviour that concerns you or that appears to disregard our policies or procedures. By speaking up, you are giving Headlam the opportunity to address and resolve the issues.

### How do we protect you?

We value the help of colleagues who identify and speak up about potential concerns that need to be addressed. You will not suffer for raising genuine concerns about suspected misconduct, and we don't tolerate any form of retaliation against individuals for speaking up. All concerns raised will be treated sensitively and dealt with in a timely and professional manner.

### The Speak Up Committee

The Speak Up Committee is responsible for governing the application of this policy across Headlam. They ensure that any concerns raised under this policy are properly investigated and report a summary of all concerns raised under this policy to the Headlam Group plc Board of Directors at least once a year. The committee consists of:

- Company Secretary
- Chief People Officer
- Director of Group Finance
- Head of Internal Audit

### Support

The HR team are on hand to support everyone. You don't have to raise a formal concern to HR. You can speak to the team for their advice and for support anytime. They are also on-hand to advise you on how to use the Speak Up policy should you need any guidance.

## Speaking Up versus raising a grievance

### What is covered by the Speak Up policy?

This Speak Up policy can be used to raise concerns about suspected, observed or any experience of misconduct or unethical behaviour in our company, specifically in relation to any violation of our policies and procedures.

Examples of misconduct or violation of policy include:

- Fraud
- Damage to the environment
- Violation of Health and Safety
- Human rights abuse
- Improper use of company resources
- Harassment, bullying and discrimination
- Insider trading
- Violation of competition law
- Disclosing confidential information
- Money laundering or violations of sanctions
- Retaliation against anyone speaking up in good faith
- Violations of policies
- Inadequate record keeping (financial or otherwise)
- Bribery or corruption
- Conflict of interests

### What is not covered under the Speak Up policy?

**Emergencies:** This policy should not be used to report events presenting an immediate threat to life or property. If you need emergency assistance, please contact the relevant emergency services.

**Grievances:** If you have a concern regarding the terms of your employment, please consult the Grievance Policy.

**Legal Disputes:** The Speak Up policy should not be used to settle personal or legal disputes between you and the company or any of its colleagues.

**False Allegations:** You should not use the Speak Up policy to make allegations which you know to be false. Doing so may lead to disciplinary measures being taken.

### The difference between the Speak Up (Whistleblowing) and Grievance (Grievance) policies

Speak Up is our 'Whistleblowing' process that should be used for raising a concern where you think others are at risk or making a disclosure in the public interest. It's different to raising a grievance under our Grievance policy, which should be used for raising a concern about yourself, and the treatment you are receiving.

The difference between the Speak Up policy and Grievance policy is not always black and white. Sometimes a concern may be raised under the Speak Up policy, but then referred to the Grievance policy as the more appropriate channel to deal with it.

The main differences between the Speak Up and Grievance policies are explained below. If you're still unsure, contact the HR team for advice and guidance.

Raising a concern through the Speak Up policy	Raising a grievance through the Grievance policy
Using the Speak Up policy is for raising a concern where you think others are at risk or making a disclosure in the public interest.	Raising a grievance tends to be about yourself, and the treatment you are receiving.
The investigation process is based on good practice guidance, and individuals have no right to be accompanied at meetings.	The process for dealing with your concerns is set out within Headlam's Grievance policy.
Headlam will respect your wish for confidentiality and anonymity when discussing concerns raised under this policy.	You have the right to be accompanied at hearings where the complaint is about a potential breach of your employment contract or terms and conditions.
You may never know the outcome of a concern raised under this policy. For example, we won't be able to tell you if disciplinary action is taken against another individual as a result of you speaking up.	You are entitled to know if your grievance has been upheld.
You do not have the right to appeal if you're unhappy with how we deal with your concerns, however you may consider escalating your concerns in accordance with this guidance.	You have the right to appeal once against the outcome of your grievance.

### How and when to speak up

Our Speak Up policy allows you to raise concerns about suspected misconduct through a variety of channels. If you're unsure which channel to use, you can contact HR for advice and guidance.

This policy does not replace the company's regular reporting lines or complaints procedures as set out within the Grievance policy.

#### Option 1 – Line manager or HR

You may choose to raise concerns with your line manager, who is required to notify the HR team. The HR team supports line managers determine the appropriate next steps for investigation. You may also choose to raise your concern with the HR team directly through [askhr@headlam.com](mailto:askhr@headlam.com).

#### Option 2 – Speak Up Committee

You can send an email to [speakup@headlam.com](mailto:speakup@headlam.com). This email address will inform the Speak Up Committee members, who will review and investigate your concern.

#### Option 3 – External Speak Up hotline

You can raise a concern, confidentially and anonymously, through the external Speak Up hotline, either via their website or via the phone.

Website: [headlam.ethicspoint.com](http://headlam.ethicspoint.com)

Telephone numbers:

- UK and Northern Ireland: 0800 046 5406
- France: 0800 736961
- Netherlands: 0800 0228815

The Speak Up hotline is managed through EthicsPoint, a compliance reporting tool that is operated by NAVEX, an external company specialised compliance and risk management solutions.

Please note that the Headlam Group plc Board of Directors will review all concerns raised under this policy at least once a year.

When speaking up, please provide as much information as possible to give us the best chance of investigating in full. Please include any relevant background or history, names, dates, places and any documents that may support your concerns. We don't expect you to have all the facts and we don't want you to attempt any investigation yourself. All we ask is that you Speak Up as soon as you can with the details you do have and leave the investigation to us.

### **Safeguarding your position and confidentiality**

We understand that speaking up is not always easy, and that you may want to remain anonymous. Whilst we can keep you anonymous, we also want to assure you that we do not tolerate negative treatment towards anyone who speaks up, and you have our full protection.

### **Are the concerns I raise kept confidential?**

Yes. Information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake. In principle, we are obliged to inform any implicated persons that a complaint has been filed against them, but your identity will not be disclosed. You can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

### **Is it possible to Speak Up anonymously?**

You can share your concerns anonymously via email, telephone or letter, or via the external Speak Up hotline. We do however encourage you to reveal your identity as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously.

### **Will privacy be safeguarded?**

We are committed to protecting the privacy of everyone involved. We will do everything to safeguard personal data from unauthorised access and processing.

### **How will I be protected if I Speak Up?**

We encourage people to speak up about any experienced, observed or suspected misconduct and colleagues are always protected when genuine concerns are raised in good faith. Any form of threat or retaliation will not be tolerated. Retaliation against anyone who raises a concern may lead to disciplinary measures against the perpetrator.

### **What should I do if I notice any retaliation?**

If you notice any retaliation against you or against anyone else for raising or having raised a concern in good faith about suspected misconduct, speak to HR immediately.

### **What happens if the Speak Up Policy is misused?**

You will not be protected if you make a malicious allegation which you know to be untrue. Furthermore, disciplinary action may be taken against you.

### **Follow up and investigation**

What can you expect to happen after you have raised a concern via Speak Up?

#### Contact

After you have raised a concern, a designated person, often someone from HR or the Speak up committee, will arrange a meeting to discuss your concerns in more detail and to gather as much information from you as possible. If you have raised a concern anonymously via the external Speak Up hotline, it is possible to submit follow up information via the hotline website, without having to disclose your identity to Headlam.

#### Initial Review

Once you have reported everything that you're aware of, we will carry out an initial review to ensure there are sufficient grounds to begin an investigation. We will let you know the outcome of this review. If proceeding to the investigation stage, we will try to give you an indication of how long the investigation will take.

#### Investigation

We will appoint an independent person to investigate your concerns. By independent we mean someone who is not implicated in any way and sits outside the hierarchical chain of command the person(s) accused of wrongdoing. The investigation could take a few weeks or even longer, depending on factors such as availability of evidence, complexity and seriousness of the allegations. The investigation may consist of interviewing potential witnesses, interviewing the person(s) accused of wrongdoing, reviewing CCTV, or gathering any other evidence available to us.

#### Outcome

We will tell you when the investigation has been completed. We may or may not be able to share the specific outcome of the investigation or any subsequent actions, depending on the details of the case. If you consider that the investigation was carried out unsatisfactorily, for example, if there are facts that you do not feel have been taken into account or new facts have emerged, you should speak with one of the members of the Speak Up Committee.

**End of Policy**