

Whistleblowing Policy and Procedure

December 2025



Foreword

Severfield plc is committed to ensuring that we act at all times with integrity and maintain the highest standards of corporate ethics in all areas of our operation. To achieve this, we want to encourage effective and honest communication and we are committed to a robust response to any malpractice brought to our attention.

This Whistleblowing Policy and Procedure enables anyone to raise genuine concerns about malpractice in the knowledge that their concerns will be taken seriously and that they will be protected from possible reprisals by colleagues and management.

Paul McNerney
Chief Executive Officer

Why this Policy is Important and Who it Applies to:

Integrity is one of our core values, and the highest standards of conduct and business integrity are expected from every employee. If you have concerns that someone's conduct is, or could be, falling short of what we expect, we want you to speak up about it.

We understand that this can be a difficult thing to do and this policy aims to reassure you that anyone who reports, in good faith, any form of malpractice or behaviour which falls short of an acceptable standard, will be protected.

This policy provides a safe and confidential framework for colleagues, contractors, and stakeholders to raise concerns about misconduct, unethical behaviour, or breaches of law and company policy. It ensures compliance with the Public Interest Disclosure Act 1998 (PIDA) and protects whistleblowers from dismissal or detriment when making a disclosure in the public interest.

This policy applies to all employees within the Group. The reporting channels and procedures are also available to temporary workers, agency staff, secondees, external consultants and contractors whilst they are working for the Group.

Defining 'Malpractice':

Malpractice is any form of behaviour that breaks the law, is unethical, or contravenes our vision and values.

The following are examples of areas where malpractice may occur:

- Accounting, auditing and Financial Reporting
- Bribery and Corruption
- Confidential and Proprietary information
- Conflicts of Interest
- Data Privacy and Protection
- Discrimination and/or harassment
- Health, Safety, Quality or Environment

- Free and Fair Competition
- Global Trade
- Human Rights
- Imminent Threat to a Person, Animals or Property
- Insider Trading
- Misuse or Misappropriation of Assets
- Political Activity
- Retaliation
- Substance Abuse
- Workplace Conduct

We Will Protect You:

If you speak up against or disclose information relating to malpractice in good faith, believing your information is accurate, we will protect you even if you are wrong.

Reporting on malpractice will not disadvantage your career or affect your relationships at work. We will not tolerate any form of retribution, discrimination or bullying of anyone who has spoken up in good faith.

If any employee is subjected to harassment or victimisation by colleagues or management as a result of their actions, we will act immediately to stop it and will take disciplinary action against the perpetrators.

Malicious Allegations:

Making a malicious allegation of malpractice is a serious offence, and we will take disciplinary action against anyone who does so.

How to Raise a Concern:

If you honestly believe or have a reasonable suspicion that malpractice is occurring or is likely to occur, you have two routes through which you can raise your concern:

1. Internal:

You can inform your immediate manager, your head of department or the Group Legal Director.

The information you give will be considered carefully and they will decide whether there are grounds for investigation. You will be notified of the intended course of action. If the decision is to proceed with further investigations, the Group Legal Director will be contacted to instigate the formal investigation process.

2. External:

You can use the company's third party provider **Navex Global (EthicsPoint)**. The Company has engaged Navex to manage whistleblowing reports in instances where an individual does not wish to raise the matter through internal channels. The identity of whistleblowers will remain confidential unless disclosure is legally required.

Reports can be made through:

- **Navex EthicsPoint online portal** (accessible 24/7)
- **Navex telephone hotline** (available in both English and Dutch languages)
- **Navex mobile app**



Reports may be made anonymously and will be investigated to the fullest extent possible.

All reports made via Navex are securely logged and transmitted to the company's designated Whistleblowing Team. Who will review the concern and assign an investigator.

Investigation:

A fair and impartial investigation will be conducted where this has been deemed necessary. Findings are documented, and corrective actions are taken where necessary.

In the interests of confidentiality and fairness, you should not discuss the matter further and you will not be contacted unless you have indicated that you are willing to be contacted by someone directly involved in the investigation.

You will be able to contact the Group Legal Director/ Group HR Director to follow the progress of the investigation including when the investigation has been completed and, where possible, you will be told of the outcome should you request to be so notified.

Appeals Procedure:

If you are unhappy with the conduct or outcome of an investigation whether this was commenced via internal reporting or via Navex, you should raise your concerns with a member of the Executive Committee. If the matter relates to safety, health or environment you should contact the Group SHE Director and, if it relates to an HR issue, the Group HR Director. You can always report your concerns directly to the Group Legal Director or any

other member of the Executive Committee. If your concern involves a member of the Executive Committee then you should contact our CEO or our Chair.

You must do this within ten (10) working days of being notified of the outcome of the investigation.

The Chief Executive Officer will review the investigation together with a member of the board who is unconnected with the process and they will take any further action that is appropriate. Their decisions will be final.

You will be notified of the outcome of their review and of their final decision.

Protection Against Retaliation:

- Retaliation against whistleblowers is strictly prohibited.
- Employees making a disclosure in good faith and in the public interest are protected under **PIDA**.
- Any employee found retaliating will face disciplinary action, up to and including dismissal.
- Whistleblowers acting in good faith are protected even if the concern proves unfounded

External Reporting:

Employees may also raise concerns directly with prescribed regulators if internal channels do not resolve the issue. Examples include:

- **Financial Conduct Authority (FCA)**
- **Health and Safety Executive (HSE)**
- **Information Commissioner's Office (ICO)**

Prescribed bodies for sanctions-related disclosures include:

- **HM Treasury (financial sanctions)**
- **Secretary of State for Business & Trade (trade sanctions)**
- **Secretary of State for Transport (transport sanctions)**

Public Interest Disclosure Act 1998:

This Act of Parliament, popularly known as the "Whistleblower's Act" provides a framework within which workers can inform on illegal, unsafe and improper practices by their employers or colleagues.

Whistleblowers that make disclosures that qualify for protection under the Act have the right not to suffer detrimental treatment from their employer.

There is a useful guide at [PIDA - Protect - Speak up stop harm \(protect-advice.org.uk\)](https://protect-advice.org.uk) which sets out details of the types of disclosures which qualify for protection and the way in which such disclosures can be made, as well as the persons to whom disclosures may be made.

Responsibilities:

- **Employees:** Report concerns promptly.
- **Managers:** Support employees who raise concerns and ensure no retaliation occurs.
- **Whistleblowing Team:** Oversee investigations and ensure compliance with this policy.
- **Board of Directors:** Monitor effectiveness of the whistleblowing framework.

Training & Awareness:

- All employees will receive training on how to use Navex reporting channels.
- Posters, intranet links, and awareness campaigns will reinforce the availability of the hotline and portal.

Review:

This policy will be reviewed annually to ensure effectiveness and compliance with UK law and regulatory requirements.

Further information:

NAVEX

- Navex EthicsPoint online portal (accessible 24/7)
- Navex telephone hotline (available in both English and Dutch languages)
- Navex mobile app

Group Legal Director

Call Mark Sanderson on 07738724769

Group HR Director

Call Samantha Brook on 07800627652

Group SHE Director

Call Kevin Furniss on 07745658548