

## Whistleblowing Policy

Owner: HR Advisor / Directors

Effective date: 23/12/2025

Review cycle: Annual

### 1. Purpose

To provide a safe and confidential process for workers to report concerns about wrongdoing or risks in the public interest.

This included concerns relating to:

- Criminal activity
- Legal or regulatory breaches
- Health and Safety dangers
- Environmental damage
- Modern slavery or labour abuses
- Harassment or Discrimination
- Deliberate concealment of any of the above.

### 2. Scope

This policy applies to:

- Employees
- Agency workers
- Contractors
- Apprentices
- Suppliers and other third parties working with LLUK

### 3. Legal Framework

This policy is aligned with:

- Public Interest Disclosure Act 1998 (PIDA)
- Worker Protection Act 2024 (harassment prevention duties).
- Relevant UK Employment and safety legislation.

## 4. How to Raise a Concern

Concerns can be raised:

### 4.1 Internally

- Whistleblowing Officer: HR Advisor or Director
- Confidential email: [hr@lluk.co](mailto:hr@lluk.co) | [rachelwalker@lluk.co](mailto:rachelwalker@lluk.co)
- Confidential phone: Rachel Walker | Managing Director: 07884267953

If the concern involves the HR Advisor or Management, the report may be made directly to a Director.

### 4.2 Externally

- Where appropriate, concerns may be reported to a prescribed external body (e.g HSE, HMRC, Environment Agency)

## 5. Investigation Process

- Acknowledgement within 5 working days where possible
- Impartial investigation conducted
- Confidentiality maintained as far as practicable
- Outcome summary shared where appropriate

## 6. Protection from Retaliation

LLUK will not tolerate retaliation against anyone who raises a genuine concern.

- Any victimisation or retaliation will be treated as a disciplinary matter.
- Workers raising concerns in good faith will be protected, even if the concern is not upheld.

## 7. Anonymous Reports

Anonymous concerns will be accepted and investigated as far as reasonably practicable. However, providing contact details may assist a more effective investigation.

## 8. Records

All whistleblowing reports will be:

- Logged confidentially
- Investigated appropriately
- Retained in line with the Records & Document Control Policy

## 9. Awareness & Training

- Covered during induction
- Refresher awareness provided periodically.