

Conducting our business with honesty, integrity and professionalism is one of the company's main aims and core values and is vital to the reputation of the business.

This policy is intended to encourage all employees of Coltart Contracts Ltd to report suspected or actual occurrence(s) of illegal, unethical or inappropriate 'events' (behaviours or practices) to the appropriate supervisor/manager/director within the company.

It also aims to clarify the procedure to be followed whilst providing reassurance that no detrimental treatment will result in the event of an individual reporting an 'event' in good faith.

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

Coltart Contracts Ltd ("the Company") is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to raise to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption or other such occurrence (s) of illegal, unethical or inappropriate events (behaviours or practices).

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

2.1 that a criminal offence has been committed, is being committed or is likely to be committed;

2.2 that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;

2.3 that a miscarriage of justice has occurred, is occurring, or is likely to occur;

2.4 that the health or safety of any individual has been, is being, or is likely to be, endangered;

2.5 that the environment, has been, is being, or is likely to be, damaged;

2.6 that information tending to show any of the above, is being, or is likely to be, deliberately concealed;

2.7 that the business or any associated person has been, is being, or is likely to be receiving or offering bribes;

2.8 that there has been, is being, or is likely to be a contravention of the Modern Slavery Act 2015 and/or the company's policies and procedures relating to such;

2.9 that any public or foreign official or other person directly connected to the company or its business has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person;

they must use the Company's disclosure procedure as set out below:

3.1 Information which an employee in good faith reasonably believes tends to show one or more of the above should promptly be disclosed to his/her immediate supervisor or manager so that any appropriate action can be taken;

3.2 If it is inappropriate to make such a disclosure to the supervisor or manager, the employee should speak to the next highest or another level of management including to a Board member;

3.3 Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure, in the event that it was made in good faith and not primarily with malice or to damage another or the company;

3.4 However, failure to follow this procedure may result in the disclosure of information losing its 'protected status';

3.5 For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to the Group HR Director. An employee of the company can report an event by providing his/her identity or, alternatively, anonymously.

Any claims or allegations which, following an investigation, are found to be malicious or vexatious may lead to disciplinary action being taken against the individual.

Responsibility for this policy is vested in the Joint Managing Directors.



Bryan McPike

Joint Managing Director



Phyllis Carroll

Joint Managing Director

Approved and Signed 30th April 2025



Whistleblowing Policy

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