Raising a Concern ("Whistleblowing") Policy

Introduction "Our Commitment to You"

Wessex Water is committed to undertaking our business with honesty and integrity in line with our BEST values. We expect all staff and others working for us to maintain these standards of behaviour. When things go wrong, intentional or otherwise, we want to be able to put things right. This policy explains how you can help us identify such situations and the support we will give to you. Our policy is one of openness. We always encourage our people to speak up. The Company will not tolerate any retaliation or victimisation (including informal pressure) of any person raising a concern under this policy.

Purpose and Scope

This policy applies to any person working for, or providing services to, the Wessex Water group including all employees, agency workers, contractors, apprentices, and trainees. It applies to any concern we might receive from a supplier, customer, or member of the public about wrongdoing. Through this policy we aim to:

- Encourage you to report any suspicions of wrongdoing to us as soon as possible.
- Provide a straightforward way for you to report your concerns.
- Give you the confidence that the matter will be taken seriously and handled sensitively.
- Enable you to report any concerns without fear of retribution.
- Make sure the issue is investigated swiftly and thoroughly.
- Put a stop to any wrongdoing in the organisation.
- Improve our practices and provide a fair and safe working environment.

What Should Be Reported?

The types of matters that should be reported include any illegal or unethical conduct. The following is a list of some examples:

- criminal activity or any attempt to conceal such activity;
- health and safety concerns;
- environmental concerns;
- breach of any statutory or regulatory obligation;
- an instruction to cover up or not report something that should be reported;
- serious concerns about the Company's service provision;
- anv form of discrimination or harassment:
- unauthorised use of Company money or assets;
- theft, fraud, bribery or corruption;
- financial irregularities; or
- unethical conduct or behaviour that fails to meet our standards and values.

We will investigate all reports of suspicious activity thoroughly, and in complete confidence. We will notify you of progress and the action being taken wherever possible. You do not need to prove or provide evidence to report the concern and if you are unsure whether your concern is covered by this policy, please report it. We will investigate it and let you know.

If there is anything which you think the Company should know about, please follow the process outlined in the separate <u>"How to Raise a Concern" guide</u>, which is summarised below.

How to raise a concern

You have a number of different options:

- 1. Call our confidential helpline on 0800 0223 119. You can do so anonymously by using 141 before dialling, and your phone number will be withheld.
- 2. Tell your manager: in person or by email.
- 3. If you feel unable to report it to your manager, or have already raised it with them and have had no response, you can report your concern either to the Group General Counsel (ruth.jefferson@wessexwater.co.uk); or to the Group Director of People (mark. nicholson@wessexwater.co.uk); or to the Group Head of Internal audit (sharon.colk@wessexwater.co.uk).
- 4. Write to our Senior Independent Non-Executive Director (Jim McKenna) at Wessex Water Services Limited, Operations Centre, Claverton Down Road, Bath, BA2 7WW by sealed letter marked "Private and Confidential".

Our Guarantee

The Company is committed to this policy and gives you its assurance that you will not suffer any form of retribution, victimisation or detriment if you use it to raise a concern.

The Company will treat your concern seriously and act according to this policy. You will not be asked to prove anything. If you ask for the concern to be treated in confidence the Company will respect your request and only make disclosures with your consent or where the law requires us to do so.

In any meetings that we might have with you to discuss your concerns you will be allowed to be accompanied by a trade union representative or colleague (if you choose). Where appropriate you will be offered support throughout the process with access to advice and counselling. You will be given feedback on any investigation and the Company will be sensitive to any concerns you may have following any steps taken under this policy.

How to Raise a Concern Guide

A more detailed <u>step-by-step guide</u> sets out how you can raise a concern and how it will be addressed.

Anonymous Reports

If, despite the legal protections offered by the law and this policy, you would like to disclose your concerns anonymously then you can still make a report to the Group General Counsel, the Group Director of Human Resources, or the Head of Internal Audit.

How the Company Will Respond

After you have raised your concern(s) the Company will confidentially make internal enquiries, and it may be necessary to carry out an investigation at a later stage which may be formal or informal, depending on the nature of the concern raised.

As far as possible, the Company will keep you informed of the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

Further Guidance

Further guidance about Whistleblowing is available from the <u>Advisory, Conciliation and Arbitration Service (ACAS)</u>.

Raising your Concern Externally

This policy gives you the opportunity and protection you need to raise your concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take.

However, if you feel you cannot raise your concerns internally and you honestly and reasonably believe they are true and that disclosure is in the public interest, you should consider raising the matter with the appropriate regulator. For contact details see the <u>guide</u> on how to raise a concern.

Contact: Ruth Jefferson Version: 6.0 (03/03/2021)