

**ISG is a dynamic global construction services company. Our people specialise in fit out, technology, construction and development and are dedicated to delivering places that help people and businesses thrive.**

## INTRODUCTION

All of us at one time or another has a concern about what is happening at work. Usually these concerns are easily resolved. However, when the concern feels serious because it involves something that might affect others, or the organisation itself, it can be difficult to know what to do. Some examples of suspected wrongdoing or dangers at work could include:

- Health & Safety danger
- Slavery, forced labour or human trafficking risks
- Failure to comply with legal or professional obligations
- Bribery/corruption
- Environmental risk
- Financial fraud/mismanagement
- Negligence
- Criminal activity
- Conduct likely to damage ISG's reputation, or that of our business partners
- Unauthorised disclosure of confidential information
- Breach of internal company policies/procedures
- A deliberate concealment of any of the above

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business, or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the Company. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The Board of Directors at ISG are committed to running the organisation in the best way possible and to do so we need your help. We have introduced this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.

This policy applies to all those who work for us; whether full-time or part-time, employed through an agency or as a volunteer. If you have a whistleblowing concern, please let us know.

If something is troubling you which you think we should know about or investigate, please use this policy.

If, however, you wish to make a complaint about your employment or how you have been treated, please use the grievance policy or bullying/harassment policy - which you can get from your manager or the HR department. This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, staff or the organisation itself.

## **If in doubt - raise it!**

### **OUR ASSURANCES TO YOU**

#### Your safety

The Board of Directors at ISG are committed to this policy. Provided you are raising a genuine concern, it does not matter if you are mistaken; you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern please contact whoever you think the most appropriate person may be from those listed in options 1 to 3 of the 'How to raise a concern' section below.

If, as part of an investigation to the concerns you have raised, it becomes clear that you have NOT used this policy in good faith, for example for malicious reasons, for self-advancement, or to pursue a personal grudge against another, this will constitute misconduct and will be dealt with in accordance with the terms of our disciplinary procedure.

#### Your confidence

With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law.

You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

In some specific circumstances it may not be possible for us to deal with your concerns internally and external authorities will need to become involved. Where this is necessary we reserve the right to make such referrals without your knowledge and consent.

Please remember that if you do not tell us who you are (and therefore you are raising a concern anonymously) it will be much more difficult for us to investigate the matter. We will not be able to protect your position or to give you direct feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

If you are unsure about raising a concern you can get independent advice from the UK based Public Concern at Work (see contact details under the 'Independent Advice' section of this policy below).

### **WHAT TO DO IF YOU RECEIVE A CONCERN RAISED BY A WHISTLEBLOWER**

#### **Do:**

- Immediately advise the ISG Company Secretary and provide all of the information you have received
- Keep the matter strictly private and confidential

#### **Do Not:**

- Contact the whistleblower yourself
- Investigate the whistleblower claims yourself. It is important not to inadvertently interfere with the investigation
- Do not contact/notify any of the individuals regarding the concern raised that the whistleblower may have accused of wrongdoing, even if they are a close colleague, your line-manager or a subcontractor you regularly deal with.

## HOW TO RAISE A CONCERN INTERNALLY

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

### Option one

If you have a concern, we hope you will feel able to raise it first with your line manager, team leader, Managing Director, Chief Operating Officer or HR representative (unless the concern is directly related to them). This may be done verbally or in writing.

### Option two

If you feel unable to raise the matter with any of the individuals noted in option 1 above,, for whatever reason, please raise the matter with:

ISG's Company Secretary (also ISG's Whistleblowing Officer)

nick.heard@isg ltd.com

+ 44 (0)7980 933792

If you want to raise the matter confidentially, please say so at the outset so that appropriate arrangements can be made.

### Option three

If options one and two above have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, or you are worried about remaining anonymous by reporting the matter internally, please contact:

Safecall - see appendix 1 for country specific contact details.

This is an independent external facilitated reporting line where you may raise your concerns. All calls are treated with the utmost confidentiality by staff who are independent to ISG and who will, should you wish for whatever reason, not disclose your identity to ISG employees.

Once the details of the concerns you are raising have been received by Safecall staff, they will summarise the content and send it to ISG's Company Secretary for dissemination/further investigation, as appropriate. If you have requested to remain anonymous further information may be sought from you, via Safecall.

You can contact Safecall 24 hours a day, seven days a week, on a freephone number (see appendix 1 for a list of freephone numbers to call depending on which country you are calling from).

Alternatively, Safecall can be contacted via e-mail [isg@safecall.co.uk](mailto:isg@safecall.co.uk), or via the web [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Details of the Safecall service can also be found on Safecall posters, which are/or soon will be displayed in a variety of offices site locations, as well as via the Governance and compliance section of ISG's intranet site, Workspace.

## HOW WE WILL HANDLE THE MATTER

Upon receipt of a whistleblowing concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will aim to give you an indication of how we propose to deal with the matter and the likely timescales involved, where possible.

When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment (or other relevant procedure), we will let you know.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy, you will help us to achieve this.

## **EXTERNAL CONTACTS**

While we hope this policy gives you the reassurance you need to raise your concern internally with us (or via the Safecall hotline), we recognise that there may be circumstances where it may be more appropriate to report such concerns to an external body, such as a regulator. However, it will very rarely, if ever, be appropriate to alert the media.

We strongly encourage you to seek advice before reporting a concern to anyone external. 'Protect' (formerly known as Public Concern at Work), the independent whistleblowing charity based in the UK, may be able to provide you with advice and their contact details are stated in the section below.

## **INDEPENDENT ADVICE**

If you are unsure whether to use this policy, or you want confidential advice at any stage, you may contact 'Protect' on + 44 (0)20 3117 2520, or by email at <https://protect-advice.org.uk/>. Their lawyers can talk you through your options and help you raise a concern about malpractice at work.

## **MONITORING / OVERSIGHT**

The Board of Directors of ISG Limited is responsible for this policy and will review it annually. ISG's Risk Committee will also regularly review and discuss the concerns raised under this policy, the investigations that have taken place and the outcomes of such investigations.

### **For and on behalf of ISG Limited**

Signed:



Paul Cossell  
**Chief Executive Officer**

Date: 27 May 2021

**APPENDIX 1**

**Safecall**

**Local incident reporting telephone numbers:**

**Europe**

<b>Austria</b>	00800 7233 2255
<b>Belgium</b>	00 800 72332255
<b>Denmark</b>	00 800 72332255
<b>Finland</b>	990 800 72332255 (Telia Sonera)
<b>Finland</b>	999 800 72332255 (Elisa)
<b>Germany</b>	00 800 72332255
<b>Luxembourg</b>	00 800 72332255
<b>Netherlands</b>	00 800 72332255
<b>Spain (inc. Canary Is.)</b>	00 800 72332255
<b>Sweden</b>	0850 252 122
<b>Switzerland</b>	00 800 72332255
<b>UK</b>	0800 9151571

**Asia**

<b>Hong Kong</b>	3077 5524
<b>India</b>	000 800 4401256
<b>Macau</b>	00 800 7233 2255
<b>Singapore</b>	800 4481773

**Middle East**

<b>UAE</b>	8000 4413376
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