

Whistleblowing Policy
Effective Date: 01 September 2025
Next Review Date: 01 September 2026

1. Purpose

Byrecroft Ltd is committed to conducting its business with honesty, integrity, and accountability. We encourage employees, subcontractors, and partners to speak up if they have concerns about wrongdoing within the business.

This policy provides a framework for raising such concerns safely and confidentially, in line with the Public Interest Disclosure Act 1998 (PIDA).

2. Scope

This policy applies to:

- All employees (permanent, temporary, apprentices, and agency staff).
- Subcontractors, suppliers, and consultants working on behalf of Byrecroft Ltd.
- All business operations, sites, and offices.

3. What is Whistleblowing?

Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work. Examples include:

- Criminal offences (e.g. fraud, theft, bribery, corruption).
- Breach of legal or regulatory obligations.
- Health and safety risks or dangers.
- Environmental damage.
- Concealment of wrongdoing.
- Modern slavery, money laundering, or other unethical practices.

Whistleblowing is different from a personal grievance, which should be raised through the grievance procedure.

4. Policy Statement

- Byrecroft Ltd will not tolerate malpractice, unethical behaviour, or cover-ups.
- We will protect whistleblowers from dismissal, victimisation, or detrimental treatment.
- Reports will be investigated thoroughly, fairly, and confidentially.
- Concerns can be raised without fear of reprisal, even if they turn out to be unfounded (provided they were raised in good faith).

5. How to Raise a Concern

Employees and others may raise concerns through the following channels:

1. Line Manager or Supervisor – where appropriate.
2. Whistleblowing Officer (Designated Director): Marc Thiaert
3. External Reporting Options:
 - Public Concern at Work (independent whistleblowing charity): 020 7404 6609
 - Relevant regulatory body (e.g. HSE, ICO, HMRC).

Concerns should be raised as soon as possible, preferably in writing, and should include as much detail as possible.



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6. Confidentiality & Anonymity

- Whistleblowers' identities will be kept confidential as far as possible.
 - Anonymous reports will be considered, though anonymity may limit investigation effectiveness.
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7. Investigation Process

- The Whistleblowing Officer will assess the concern and decide the course of action.
 - Investigations may involve internal managers, external auditors, or regulators.
 - Outcomes will be communicated to the whistleblower where appropriate and lawful.
 - Malicious or knowingly false allegations may result in disciplinary action.
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8. Protection for Whistleblowers

- Whistleblowers acting in good faith are protected under PIDA 1998.
 - Victimisation of whistleblowers will not be tolerated and may lead to disciplinary action or termination of contracts.
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9. Responsibilities

- Board of Directors – ensure effective implementation and oversight of this policy.
 - Managers & Supervisors – create a safe environment for concerns to be raised.
 - Employees & Subcontractors – raise genuine concerns and cooperate with investigations.
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10. Monitoring & Review

- This policy will be reviewed annually by the Board of Directors.
 - Lessons learned from whistleblowing reports will be used to improve processes and controls.
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11. Approval

Approved by the Board of Directors Byrecroft Ltd

Date Signed: 02 September 2025



Signed: _____

Name: Marc Thiart

Position: Director