



HUMAN NATURE:
AT ITS BEST

People
Policy
GC23POL05



WHISTLEBLOWING
POLICY

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PURPOSE

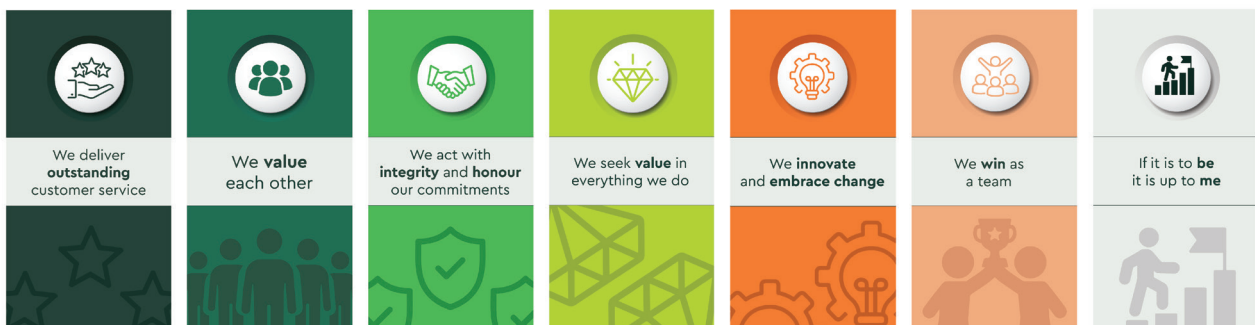
At Ground Control we are committed to dealing with any concerns about the company openly, responsibly and confidentially. If you have any genuine concerns about something to do with the company, for example, you believe wrongdoing, mismanagement or malpractice has occurred, or may occur in the future, we naturally want to know about this as soon as possible.

This policy sets out our procedure for raising concerns about incidents of wrongdoing, malpractice or mismanagement in the workplace, and how we will deal with those concerns. This could relate to any practice, procedure or policy carried out by any officer or employee of the company. For example, a breach of rules, irregularity, a danger to our employees or our customers, concerns about modern slavery, financial malpractice, breach of legal obligations, or something that may damage the environment.

VALUES

At Ground Control our values are a key component of how we operate as a business. They are at the core of who we are as a business and lay the foundation for our culture.

Our people policies were developed in alignment with our values, and we expect all people and managers to apply our values in their interactions and in implementing this policy.



WHO IS THIS POLICY FOR?

This policy applies to all individuals working within or with the Ground Control group, including permanent and temporary employees, agency staff, consultants, contractors, Field Teams, external stakeholders and members of the public who wish to raise concerns.

PROCESS

Individual raises a concern

If not anonymous, individual is invited to a meeting

Investigation commences

Outcome of investigation communicated where possible

If individual is dissatisfied, they can further
escalate the concern

This is not a definitive process.
At any stage detailed above, the decision may
be made to take no further actions.

PROCESS FOR EXTERNAL STAKEHOLDERS OR MEMBERS OF THE PUBLIC

Receipt of a concern received. This could be via our Contact page on the website or through our Independent Speakup Provider.

If not anonymous, if deemed necessary investigation manager will speak to individual to gather facts and evidence.

Investigation commences

Outcome of investigation is communicated where possible

If the individual is dissatisfied, they can further escalate the concern

This is not a definitive process. At any stage detailed above, the decision may be made to take no further actions.

OUR WHISTLEBLOWING POLICY

Whistleblowing is the act of reporting suspected wrongdoing, mismanagement or malpractice.

This could include concerns about:

- Someone having committed, or being likely to commit, a criminal offence.
- A failure to comply with any legal or regulatory obligation.
- A miscarriage of justice.
- Something which endangers the health and safety of an individual.
- Modern slavery.
- Damage to the environment.
- Fraud or financial irregularity.
- Blackmail, corruption or bribery.
- Deliberate concealment relating to any of the above.

The incident or failure may have occurred, or be likely to occur, in any location, either in the UK or elsewhere, irrespective of what law applies in that location.



REPORTING ISSUES

Our primary aim is to prevent workplace wrongdoing, mismanagement or malpractice from occurring in the first place.

If it happens, we want to prevent it from recurring. If appropriate, we will make every effort to resolve the situation promptly. If that isn't possible, we will then take further action to investigate the matter fully and take appropriate action.

When reporting an issue, you must reasonably believe that wrongdoing relating to one of the categories on page five is being, is likely to be, or has been committed. Your disclosure must also be in the public interest. Broadly, this means it must impact people at large in some way.

Raising a concern

If you have a concern about wrongdoing, mismanagement or malpractice in the workplace, you should first discuss it with your line manager or another people manager. They will attempt to resolve the matter as promptly as possible.

There may be circumstances where you feel unable to approach your line manager. If so, you can raise your concerns through our independent 'speak up' helpline, or directly with a member of our People Team.

We recommend outlining:

- the details of the suspected wrongdoing, mismanagement or malpractice
- the names of any details involved; and
- the outcome you would like to see.

OUR INDEPENDENT 'SPEAK UP' HELPLINE

This confidential helpline is run by Safecall our third-party providers, to ensure that any concerns about wrongdoing, mismanagement or malpractice in the workplace are raised and addressed appropriately.

You may choose to remain anonymous, but you will be encouraged to provide your name and contact details, to help make the subsequent investigation as effective as possible, and so we can keep you up to date with progress.

You can contact them on: **0800 915 1571** or **1 800 812 470** if you are in Ireland, or use the form on the following link:

www.safecall.co.uk/report



REPORTING ISSUES IF YOU ARE NOT AN EMPLOYEE

We are committed to ensuring that anyone, whether or not they are employed by us, can raise concerns about wrongdoing, risks, or misconduct.

If you are a member of the public, a contractor, a supplier, or otherwise not employed by us, you can report your concern via the Contact section of our website or via the independent 'speak up' helpline. The contact section on our website provides a channel for submitting information and includes a link to this Whistleblowing Policy for your reference.

When making a report, please provide as much detail as possible to help us assess and investigate your concern. Reports can be made anonymously, although doing so may limit our ability to follow up with you for further information.

We treat all concerns and reports seriously and where appropriate, will be investigated thoroughly with a commitment to resolving the matter promptly and responsibly. We will handle all issues raised in accordance with this policy, ensuring confidentiality to the fullest extent possible.

OUR INDEPENDENT 'SPEAK UP' HELPLINE

This confidential helpline is run by Safecall our third-party providers, to ensure that any concerns about wrongdoing, mismanagement or malpractice in the workplace are raised and addressed appropriately.

You may choose to remain anonymous, but you will be encouraged to provide your name and contact details, to help make the subsequent investigation as effective as possible, and so we can keep you up to date with progress.

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REPORTING ISSUES

Concerns are triaged to the appropriate route:

Type of concern	Routed to
Employee grievance	HR
Whistleblowing	As per Whistleblowing Policy
Complaint about work	Division complaint handling team
HSQE issues (safety, quality)	Red/Amber Alert process via HSQE

If you are not sure which of the above categories your concern is related to, the concern will be reviewed by the HSQE Director and People Director to determine if investigation is warranted based on:

- Is it about Ground Control, a customer, or a supplier?
- Is it recent and within a reasonable timeframe?
- Does it relate to a breach of our Code of Conduct, policies, or legal obligations?
- Could it pose a risk to health, safety, the environment, or business reputation?
- Has the issue been raised before, and was it adequately addressed?
- Is there sufficient detail or evidence to allow investigation?
- Could the issue affect others beyond the individual raising it?



THE ACTION WE WILL TAKE

What happens next

If you raise a concern of wrongdoing, mismanagement or malpractice, and we have your name and contact details, we will likely ask you to attend a meeting so we can discuss the concerns raised in more detail. This may result in us commencing an investigation process which we will seek to complete as quickly as possible.

If you decide to remain anonymous, all communications will be through Safecall, our external helpline provider, who will identify you using an individual reference number.

If the concern raised is found to be valid, we may take one or more of the following steps (which is a non-exhaustive list):

- Refer the matter to the Ground Control Executive Committee with a view to carrying out an internal investigation
- Refer to a technical expert
- Refer you to our grievance procedure
- Refer the matter to our Board of Directors
- Refer the matter to an appropriate external regulatory body for further investigation
- Refer the matter to the police.

You will, unless exceptional circumstances don't allow it, be informed of the resulting action, either directly, in writing, or through Safecall, and you must treat such information in the strictest confidence.

IF YOU ARE DISSATISFIED

If you are dissatisfied with the way your disclosure has been dealt with, you should raise your concern in writing to a member of our ExCo, or by calling Safecall, and your concerns will be investigated.

It is important to set out the grounds of your appeal really clearly. You should set out the basis on which you consider that your concern has not been satisfactorily dealt with.

You may again be asked to attend a further meeting to discuss the details of your appeal. You may attend this meeting with a colleague, or a trade union representative should you wish.

If, after having followed the steps set out above, you remain genuinely and reasonably dissatisfied with the outcome, you can raise your concern, on a confidential basis, with:

- the relevant regulatory authority
- a member of parliament, or
- a professionally qualified lawyer, in order to obtain legal advice.

You should seek advice if you are thinking of raising any concerns with the media as you may not have protection under whistleblowing laws unless certain conditions are met.

TIMELINES AND FOLLOW-UP PROCESS

We aim to:

- Acknowledge concerns within 2 working days
- Confirm whether the issue will be investigated within 7 days
- Complete investigations and share outcomes within 30 days

If not anonymous, complainants will receive updates at each stage.

A final response will summarise findings, actions taken, and next steps.

If the concern is not accepted for investigation, we will explain why.

Outcomes May Include:

- Changes to policies or procedures
- Internal learning or training
- Escalation to the Board
- Other corrective or preventive actions



YOUR PROTECTION

Confidentiality

So far as possible, the company will not disclose your identity, if known, at any time, unless it's necessary to do so for the purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation.

This applies provided you:

- raise any concerns in good faith and not out of malice or with a view to personal gain on your part
- have reasonable grounds for believing your concerns to be true, and;
- have complied in full with the spirit of the policy and the process set out above.

While we will take every effort to ensure your identity isn't disclosed, it may become necessary to identify you or become possible for third parties to deduce your identity. For this reason, we can't guarantee anonymity.

We will also take all reasonable steps to ensure you are not subjected to any harassment, victimisation or disciplinary action as a result of raising your concerns. As far as possible, any supporting evidence relating to your disclosure will be kept secure at all times.

We do encourage anonymous reporting over remaining silent but we acknowledge that an anonymous report is likely to be more difficult for us to investigate and we will not be able to provide you with detailed feedback.

Our commitment to you

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

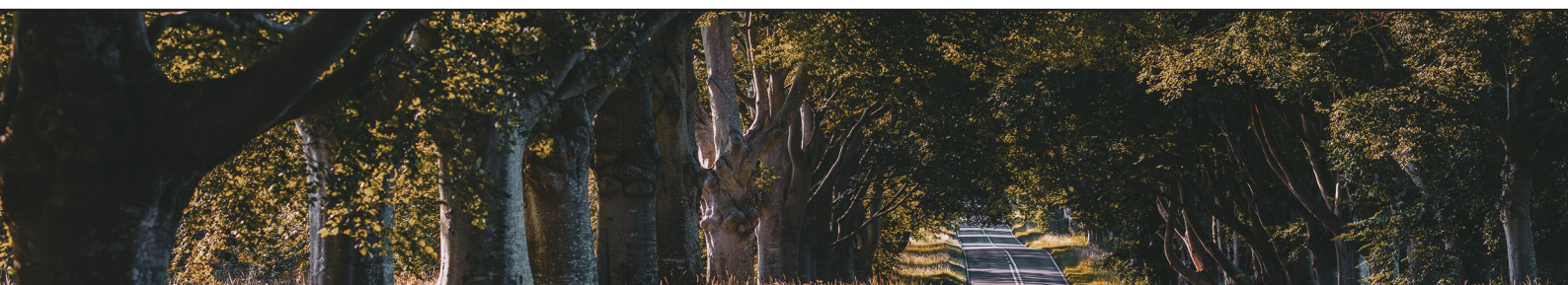
If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated respectfully and that you are provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the People Team. You may also wish to review our Grievance Policy and Procedure and raise a grievance if the policy and procedure applies to you. It's important to note that any detrimental treatment you suffer in these circumstances will not be tolerated and will be treated as a disciplinary offence.

Where retaliation or detrimental treatment is identified, we may take action in line with our policies, which could include suspension and up to termination of employment. In the case of a client, supplier or contractor, we may look to bring the working relationship to an end.

Unfounded allegations

If you make an allegation in good faith that is not confirmed by subsequent investigation, no action will be taken against you. However, malicious or unfounded allegations may result in disciplinary action against you.



MODERN SLAVERY

At Ground Control we are aware that modern slavery is a growing issue within the UK and globally. Preventing modern slavery occurring within our labour force or supply chain is a key aim of ours and we have a zero-tolerance approach to modern slavery. If you have any suspicions or concerns relating to modern slavery, you can raise them via the whistleblowing process outlined in this policy.

You can also report modern slavery via the national modern slavery helpline on:

0800 0121 700.

Please also ensure that you review our Modern Slavery Policy which can be found on our Integrated Management System (IMS).



FAQS

What is whistleblowing?

Whistleblowing is the act of reporting suspected wrongdoing, mismanagement or malpractice. If after reading this policy, you are unsure if your concern falls into the category of whistleblowing, you can speak to a member of the People team, or call our independent 'speak up' helpline run by Safecall. You can contact them on: **0800 915 1571**, or **1 800 812 470** if you are in Ireland, or use the form on the following link:

www.safecall.co.uk/report.

How do I raise a concern?

You can raise a concern by speaking to your line manager, a member of the People team, or by calling our independent 'speak up' helpline run by Safecall. You can contact them on **0800 915 1571**, or **1 800 812 470** if you are in Ireland, or use the form on the following link:

www.safecall.co.uk/report.

How do I raise a concern if I am a member of the public or stakeholder?

If you are a member of the public, a contractor, a supplier, or otherwise not employed by us, you can report your concern via the [Contact](#) section of our website or via our 'Speak Up' helpline.

What is the difference between a grievance and a whistleblowing concern?

It can be tricky to differentiate between a grievance and a whistleblowing concern but whistleblowing is raising concerns about wrongdoing, mismanagement or malpractice which impacts other individuals and is in the public interest. A grievance is typically related to concerns you have about actions that affect you.

What protection am I afforded if I raise a whistleblowing concern?

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern. We will always ensure anyone who raises a concern in accordance with this policy is provided with the right amount of support and protection.

Can I get help or advice?

We would recommend that you speak to your line manager, a member of the People team or our independent 'speak up' helpline run by Safecall. You can contact them on: **0800 915 1571**, or **1 800 812 470** if you are in Ireland, or use the form on the following link:

www.safecall.co.uk/report.

Is the process confidential?

If you have raised the concern in good faith we will do our utmost to ensure we protect your confidentiality and identity. We may need to do so if it is necessary to do so for the purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation but we will discuss this with you.

FAQS

Things to note

- This policy is separate from your contract with Ground Control.
- It replaces all previous Whistleblowing policies.
- We'll review this policy regularly to make sure it is up to date and complies with relevant legislation. The next review data is April 2026.
- We may change this policy at any time.

Arrangements for the control and management of GC23POL05 are contained within the Ground Control Integrated Management System (IMS). The effectiveness of these arrangements and our performance are routinely monitored and is subject to an annual review as a minimum. This Policy will be brought to the attention of all employees, Field Teams, supply chain partners and persons working on behalf of Ground Control.

Authorisation



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www.ground-control.co.uk

