
Whistleblowing Statement

Introduction:

GRAHAM seeks to ensure the proper conduct of its business and is committed to effective governance, and the highest possible standards of openness, honesty, and accountability.

This statement supports that commitment by encouraging all employees, contractors and third parties who may have serious concerns about any aspect of GRAHAM's work, to be able to raise those concerns in good faith, in confidence and without fear of recrimination.

GRAHAM is committed to dealing responsibly and professionally with any genuine concern raised about malpractice, be it danger to staff or the public, financial malpractice, breach of legal obligations or damage to the environment.

GRAHAM acknowledges the legal protection, under the Public Interest Disclosure Act 1998, provided for workers who make disclosures about improper practice.

How to raise a concern:

Concerns can be raised if there is a reasonable belief that one or more of the following has occurred:

- Gross mismanagement.
- Actions that are illegal, fraudulent and/or corrupt, including the making and/or accepting of bribes.
- Any facilitation of tax evasion.
- Actions that compromise health and safety at work.
- The concealment of any of the previous matters.
- Similar behaviour not otherwise described.

Concerns are better raised in writing; we would ask that you email your concerns to:

- whistleblowing@graham.co.uk

In this email, please set out the background and history of the concern, giving names, dates, and places where possible, and the reason why the situation has raised particular concern.

Access to this whistleblowing mailbox is restricted to two members of management within our Group Governance, Risk and Assurance team, who are not directly involved in the delivery of GRAHAM projects. It is this team that will conduct the investigation into your concern.

Safeguards:

GRAHAM recognises that the decision to report a concern can be a difficult one, not least because of the fear of reprisal from those responsible for the misconduct. GRAHAM will not tolerate harassment or victimisation and will take all reasonable measures to protect those who raise a concern in good faith.

GRAHAM will protect the identity of the person making the disclosure (wherever possible), where they have requested that their name be kept confidential. During the course of an investigation, GRAHAM will keep a minimum number of people aware of who raised the matter.

We encourage those making a disclosure to put their name to the allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of Senior Management.

If an allegation is made in good faith but it is not confirmed by the investigation, no action will be taken against the person making the disclosure. If, however, individuals make malicious or vexatious allegations, the allegations will not be taken further and where applicable, disciplinary action may result.

GRAHAM is committed to ensuring that all individuals have the ability to raise genuine concerns in good faith without fear of victimisation, subsequent discrimination, or disadvantage, even if they turn out to be mistaken.