

### SPEAKING UP

OUR WHISTLEBLOWING POLICY AND A GUIDE TO HELP YOU SPEAK UP AND REPORT A SERIOUS CONCERN.



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### OUR VALUES

Our values underpin how we implement our strategy, defining who we are and how we do business.

- Working together
  We are one Crest. We value our diverse and inclusive workplace and support each other. We collaborate closely to build fair and rewarding relationships.
- Being the best we can be
  We improve and inspire each other to get things done. We have passion for what we do and pride in how we accomplish it.
- Doing the right thing

  The safety and wellbeing of our employees, partners and communities is our number one priority. Everything we do is built on a foundation of integrity, quality and care.
- Championing our people
  We invest in the wellbeing and development of our people. We provide them with the tools and support to be the best they can be.
- Leaving a positive legacy
  We care passionately about the natural environment. We create beautiful homes and places that deliver lasting benefits to our customers and communities.

# AN INTRODUCTION FROM OUR CHIEF EXECUTIVE



**Dear Colleagues** 

Behaving in line with our values is essential for our success. We strive to provide a place where we are all proud to work. This means acting honestly and treating each other and our customers, partners and supply chain, fairly and with respect.

We want to maintain an open and honest culture where all those who work for us know they can ask a question, raise an issue, or challenge something and expect to be listened to.

Please speak up if you are concerned about anything. If you raise a genuine concern, you can be confident you will be treated with respect and we will investigate the matter and undertake action where necessary.

Speaking up will help us be safer and perform better. Please take time to read this guide and understand how you can raise a concern.

Martyn Clark
Chief Executive



# SPEAKING UP

Speaking Up, otherwise known as whistleblowing, is the reporting of suspected wrongdoing or dangers in relation to our activities.

If you Speak Up and report issues of concern you have a right to be protected from harassment, victimisation, dismissal or any other reprisal or detriment as a result of reporting your concern unless it is later proved that the information provided was false to your knowledge.

Some examples of activities that would cause you to raise a concern:

- Health and safety risks
- Criminal activity such as theft, fraud, tax evasion and bribery
- · Discrimination and harassment
- Breach of legal or professional obligations
- Damage to the environment.

Anyone who works for Crest Nicholson, whether an employee, subcontractor, contractor, casual worker or agency worker, has the right to Speak Up.

### HOW TO REPORT A CONCERN

We have a number of mechanisms to support you in raising a concern.

While you can remain anonymous it is really important that you provide us with as much information as possible, so we are able to investigate the matter.

Failure to provide appropriate detail may prevent us from being able to investigate.

Wherever possible, you should provide the following:

#### 1. Description of the event

You should include the date of the event, location, how you became aware of the issue being reported and supporting evidence

#### 2. Name and position of people involved

You should outline those who had knowledge of the issue being reported and names of anyone or organisation aware

#### 3. Policy deviation

By this we mean, what breach of policy or regulation happened that caused you to report this concern

#### 4. Impact

Actual or potential impact to us i.e. costs involved or impact on our public image

If you are happy to provide your name and your position, please do so, so we can contact you and take further information where required. Alternatively, you can report your concern confidentially.

We will keep your identity confidential unless disclosure is required by law or consent is given by you.

# WHO YOU SHOULD REPORT CONCERNS TO

In the first instance you should report your concern to your line manager or, if that is not appropriate, with a more senior manager within Crest Nicholson.

If you don't consider this appropriate, you should contact the Group HR Director and/or the Group Company Secretary (details at the end of this guide).

If you are unable to raise an issue within Crest Nicholson, you should contact our whistleblowing hotline 24/7 on:

0800 068 9449 or via www.crestnicholson.ethicspoint.com

This service is run by Navex Global, an anonymous, confidential and free telephone service that enables employees and supply chain partners to report concerns. More information on Navex Global can be found on Grapevine.



## WHAT WILL HAPPEN NEXT?

Once a concern has been raised through one of these channels, the Group Human Resources Department and Company Secretarial Department will review the case. Following their review, the Group Human Resources Department will either investigate the allegations themselves, or refer the matter to others for investigation.

On raising a concern (if not anonymous) we will let you know:

- How and by who the concern will be handled
- How long the investigation will take
- The outcome of the investigation, where appropriate
- That you are entitled to independent advice

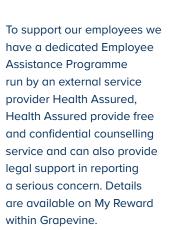
If, having reported a matter, you do not believe that it is being appropriately dealt with, you should follow the Group's grievance procedure contained within the Grievance Policy.

If the matter is still not resolved once the above steps have been followed, or in an emergency, you should report the matter to an appropriate outside body (such as the Health & Safety Executive or Environment Agency).

All concerns raised will be treated fairly and if the concern you raised has been made honestly, even if it is not confirmed by subsequent investigation, no action will be taken against you.

# PROVIDING YOU SUPPORT

We understand that Speaking Up can be hard and that you may have to make a difficult decision.





Alternatively, you can contact the registered charity Protect on **020 3117 2520**.



### **ANY QUESTIONS?**

If you want more information, or you have any questions about Speaking Up please contact:



Martyn Clark
Chief Executive
Martyn.Clark@crestnicholson.com



Jane Cookson
Group HR Director
Jane.Cookson@crestnicholson.com



**Penny Thomas**Group Company Secretary
Penny.Thomas@crestnicholson.com

### IMPORTANT INFORMATION

This policy does not form part of any employee's contract of employment and we may amend it at any time.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure set out in our Grievance Policy

The Audit and Risk Committee of Crest Nicholson Holdings plc has oversight of this policy.



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