



SPEAKING UP

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



CREST
NICHOLSON



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OUR VALUES

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

- 1 Work as One Crest**
We work toward a common goal and see the bigger picture
- 2 Committed to success**
We strive to be the best and deliver on our promises
- 3 Considered decision making**
We act with integrity and make thoughtful decisions
- 4 Investing in our people**
We empower our people to deliver our success
- 5 A positive legacy for our customers and communities**
We deliver high quality, sustainable 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.

Peter Truscott
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 the General Counsel and 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**

Our whistleblowing 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.

The logo for Navex Global, featuring the word "NAVEX" in a large, orange, sans-serif font, followed by "GLOBAL" in a smaller, grey, sans-serif font.

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.

To support our employees we have a dedicated Employee Assistance Programme run by an external service provider Health Assured, Health Assured provide free and confidential counselling service and can also provide legal support in reporting a serious concern. Details are available on My Reward within Grapevine.



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:



Peter Truscott
Chief Executive
Peter.Truscott@crestnicholson.com



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



Kevin Maguire
General Counsel and
Company Secretary
Kevin.Maguire@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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