

ISG is a dynamic global construction services company. Our people specialise in fit out, technology, construction and development and are dedicated to delivering places that help people and businesses thrive.

INTRODUCTION

All of us at one time or another has a concern about what is happening at work. Usually these concerns are easily resolved. However, when the concern feels serious because it involves something that might affect others, or the organisation itself, it can be difficult to know what to do. Some examples of suspected wrongdoing or dangers at work could include:

- Health & Safety danger
- Slavery, forced labour or human trafficking risks
- Failure to comply with legal or professional obligations
- Bribery/corruption
- Environmental risk
- Financial fraud/mismanagement
- Negligence
- Criminal activity
- Conduct likely to damage ISG's reputation, or that of our business partners
- Unauthorised disclosure of confidential information
- Breach of internal company policies/procedures
- A deliberate concealment of any of the above

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business, or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the Company. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The Board of Directors at ISG are committed to running the organisation in the best way possible and to do so we need your help. We have introduced this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.

This policy applies to all those who work for us; whether full-time or part-time, employed through an agency or as a volunteer. If you have a whistleblowing concern, please let us know.

If something is troubling you which you think we should know about or investigate, please use this policy.

If, however, you wish to make a complaint about your employment or how you have been treated, please use the grievance policy or bullying/harassment policy - which you can get from your manager or the HR department. This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, staff or the organisation itself.

If in doubt - raise it!

OUR ASSURANCES TO YOU

HOW TO RAISE A CONCERN INTERNALLY

Please remember that you do not need to have firm evidence of malpractice before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Option one

If you have a concern, we hope you will feel able to raise it first with your line manager, team leader, Managing Director, Chief Operating Officer or HR representative (unless the concern is directly related to them). This may be done verbally or in writing.

Option two

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy, you will help us to achieve this.

EXTERNAL CONTACTS

While we hope this policy gives you the reassurance you need to raise your concern internally with us (or via the Safecall hotline), we recognise that there may be circumstances where it may be more appropriate to report such concerns to an external body, such as a regulator. However, it will very rarely, if ever, be appropriate to alert the media.

We strongly encourage you to seek advice before reporting a concern to anyone external. 'Protect' (formerly known as Public Concern at Work), the independent whistleblowing charity based in the UK, may be able to provide you with advice and their contact details are stated in the section below.

INDEPENDENT ADVICE

If you are unsure whether to use this policy, or you want confidential advice at any stage, you may contact 'Protect' on + 44 (0)20 3117 2520, or by email at <https://protect-advice.org.uk/>. Their lawyers can talk you through your options and help you raise a concern about malpractice at work.

MONITORING / OVERSIGHT

The Board of Directors of ISG Limited is responsible for this policy and will review it annually. ISG's Risk Committee will also regularly review and discuss the concerns raised under this policy, the investigations that have taken place and the outcomes of such investigations.

For and on behalf of ISG Limited

Signed:

Paul Cossell
Chief Executive Officer

Date: 27 May 2021

APPENDIX 1

Safecall

Local incident reporting telephone numbers:

Europe

Austria	00800 7233 2255
Belgium	00 800 72332255
Denmark	00 800 72332255
Finland	990 800 72332255 (Telia Sonera)
Finland	999 800 72332255 (Elisa)
Germany	00 800 72332255
Luxembourg	00 800 72332255