

Speak Up Whistleblowing Policy

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1. Introduction

This Policy

- 1.1 All of us at one time or another have concerns about what is happening at work. Usually these are easily resolved. However, when the concern feels serious because it is about a possible fraud, danger or malpractice that might affect others or Speedy, it can be difficult to know what to do.
- 1.2 You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers, to Speedy or your business. 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.
- 1.3 The Board of Speedy is committed to running Speedy 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 a serious matter 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.
- 1.4 This policy applies to all directors, permanent employees, temporary employees, volunteers and contractors working for Speedy as well as our shareholders and those doing business with Speedy, for example Speedy's suppliers. If you have a concern about a serious matter including those matters described in section 3 of this policy, please speak up.
- 1.5 If something is troubling you which you think we should know about or look into, please use this policy. If, however, you wish to make a complaint about your employment at Speedy or how you have been treated, please use the Grievance Policy or Anti-Harassment Policy - which you can get from your manager, the Hub or HR. This policy is primarily for concerns where the interests of others or of Speedy itself are at risk.

If in doubt – speak up!

2. Our assurance to you

Your safety

- 2.1 The Board of Speedy is committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job at Speedy or suffering any form of retribution or retaliation from Speedy as a result. We will not tolerate the harassment or victimisation within Speedy of anyone raising a genuine concern. Provided you are acting in good faith, it does not matter if you are mistaken. Of course we do not extend this assurance to someone who maliciously raises a matter they know is untrue, such circumstances may result in disciplinary or other action.

Your confidentiality

- 2.2 With the above assurances, we hope you will raise your concern openly. However, we do recognise that there may be circumstances when you would prefer to speak to someone in confidence first. **If this is the case, please say so at the outset.**
- 2.3 If you ask us not to disclose your identity, we will not do so (beyond those limited persons who need to know to investigate the concern that you have raised) without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.
- 2.4 Please remember that if you do not tell us who you are it will be much more difficult for us to look into the matter. We will not be able to protect your position and may not be able to give you feedback where appropriate. Accordingly you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.
- 2.5 If you are unsure about raising a concern you can get independent advice from Protect (see contact details at at section 8 below).

3. What should I report under this policy?

Whistleblowing is the reporting of suspected wrongdoing or dangers relating to Speedy activities. You can raise a concern under this policy if you have genuine concerns or suspicions about any wrongdoing (or attempts to conceal any wrongdoing) including any of the following matters:

- theft of Speedy or supplier property in Speedy custody;
- financial or accounting impropriety including fraud, corruption, bribery or facilitation of tax evasion or money laundering;
- significant deficiencies or material weaknesses in Speedy's systems of internal controls or any other significant weakness related to auditing or accounting matters which may have a material effect on Speedy's financial statements;
- the improper use or disclosure of confidential or commercially sensitive information;
- the improper use of insider information for dealing in the shares of Speedy Hire Plc;
- a criminal offence or a failure to comply with legal obligations;
- involvement in human trafficking and/or "modern slavery" of Speedy or its suppliers;
- a breach of the terms of a licence;
- the health or safety of anyone being endangered;
- unauthorised changes to terms and conditions;
- damage to the environment;
- conduct likely to damage Speedy's reputation or financial wellbeing; or
- a failure to comply with Speedy's policies, procedures or internal controls (including the Delegation of Authority Limits).

4. How to raise a concern internally

- 4.1 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.

Step one

- 4.2 If you have a concern about wrongdoing, we hope you will feel able to raise it first with your Speedy manager. This may be done orally or in writing.

Step two

- 4.3 If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with the Chief People Officer; Group HSSEQ Director; the Head of Risk and Assurance; or the General Counsel and Company Secretary, whose contact details can be found within Speedy's contact directory.
- 4.4 These whistleblowing officers are experienced senior individuals who have responsibility for dealing with whistleblowing concerns.
- 4.5 If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Step three

- 4.6 Alternatively, you may contact the whistleblowing officers by sending an email to whistleblowing@speedyservices.com or you may submit a whistleblowing report anonymously via our independent whistleblowing service provider, SeeHearSpeakUp ("SHSU") by calling 0800 026 0477 in the UK or 1 800 901 631 in the Republic of Ireland or by following this link: <https://fileaconcern.org/speedyhireplc>.

- 4.7 The SHSU online portal can be accessed 24/7. You will be provided with a PIN unique to your report and, once the answer fields have been completed and the report has been submitted, you can use this PIN if you wish to provide any additional information or communicate anonymously with one of the whistleblowing officers. For further information on submitting a report through SeeHearSpeakUpSee the Legal section on Speedy Connect or follow the below link:

<https://share.vidyard.com/watch/FZ4aCt4yEwAK8xrdmgvktz?>

- 4.8 Please remember to provide as much detail as possible in your report and attach any relevant files whatever medium you choose to report through to enable your concern to be investigated appropriately. Where you provide your name and contact details, one of the whistleblowing officers will get in touch with you.
- 4.9 You may choose to raise your concerns anonymously, however before doing so please consider that by giving your name:
- you are protected from any retaliation from Speedy under this policy and our assurance to you;

- you enable the whistleblowing officers the opportunity to seek further information from you to allow them to consider what action needs to be taken and conduct a full investigation; and
- you will get feedback where appropriate.

5. How to raise a concern if you are an external party

- 5.1 Please follow step one (see section 4.2 above) in raising the matter with your principal contact at Speedy.
- 5.2 If you feel unable to raise the matter with your principal contact at Speedy then please follow the process at step three (see sections 4.6 to 4.8 above).
- 5.3 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.

6. How we will handle the matter

- 6.1 Once you have told us of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it. If we have misunderstood the concern or there is any information missing please let us know. Where you have reported the matter via the SeeHearSpeakUp online portal, we will communicate with you via that online portal where you are willing to do so.
- 6.2 When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our Grievance Policy or Anti-Harassment Policy or other relevant policy, we will let you know.
- 6.3 Where appropriate 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.
- 6.4 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. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in section 4.3 not already involved.

7. Making disclosures externally

While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where it may be appropriate for you to report your concerns to an external body, such as a regulator. We would strongly encourage you to seek advice before reporting a concern to anyone external to Speedy and Protect detailed below will be able to advise you on such an option if you wish.



8. Independent advice

If you are unsure whether to raise a concern under this policy or you want confidential advice at any stage, you may contact the independent whistleblowing charity **Protect** on 020 3117 2520 or by email at whistle@protect-advice.org.uk.

Protect operate a confidential helpline and have qualified people who can talk you through your options and help you raise a concern about malpractice at work. They also hold a list of prescribed regulators for certain types of concerns.