

Whistleblowing Policy

Introduction

City Energy Network is committed to conducting business with exceptionally high standards of professionalism and integrity.

It is important to us that any wrongdoing at work is reported and properly dealt with.

This policy reflects our commitment that any genuine concerns you have in relation to wrongdoing at work and raised under this policy will be taken seriously and dealt with appropriately.

The aims of this policy are to:

- Empower you to report any genuine concerns about wrongdoing at work
- Provide guidance on how to report any wrongdoing and how such concerns will be dealt with
- Demonstrate that we are serious about addressing any genuine concerns about wrongdoing and that we will support any individuals who raise such concerns within the terms of this policy
- Make it clear that City Energy Network will not tolerate mistreatment of anyone who raises genuine concerns about wrongdoing, even if it turns out that those concerns were misplaced.

This policy should not be used for complaints relating to your own personal circumstances, for example if you believe that you are being bullied or discriminated against or that the terms of your contract have been breached. Such concerns should be raised under the City Energy Network grievance/complaints procedure.

Please note this policy is non-contractual and we may change all or any part of this policy in any way at any time and while it sets out our response to disclosures, it does not commit City Energy Network to responding in a particular way.

1. Who does this policy apply to?

This Policy applies to our employees, workers, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns that work within the control of the Group's regulated entities.

2. What is whistleblowing?

Whistleblowing is the name given to the reporting of certain types of wrongdoing by people who work for us. This will usually, although not always, be something you have seen or noticed at work. We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or that breaches ethical or professional codes. We will take your concerns seriously; they will be thoroughly investigated, and you can be confident there will be no reprisals if you do make a report under this Policy.

If you have genuine concerns that wrongdoing is taking place at work, you should raise them under this policy. Examples of "Wrongdoing" may include.

- Criminal activity
- Failure to comply with any legal, professional, or regulatory obligation
- Poses a danger to health and safety
- May damage the environment
- May breach our *Bribery Policy*
- May facilitate tax evasion
- Shows financial fraud or mismanagement or the deliberate concealment of any of the above matters

3. What should you do if you have a complaint about something else?

If you have a complaint or issue which does not fall into the categories listed above or relates to a personal matter, then these should be raised using our Grievance Policy. If your complaint relates to the conduct of others towards you, then you should also refer to our Bullying & Harassment Policy.

4. How to raise a whistleblowing concern

You should usually raise a whistleblowing concern with your line manager. This can be done informally, and your line manager can provide advice regarding appropriate next steps. If the matter involves your line manager or if the concern you wish to raise

is very serious you can email our dedicated and confidential mailbox whistleblowing@cityenergy.co.uk your email will be picked up and reviewed.

Please state within the subject header Whistleblowing Policy. Include as much information in your correspondence as possible, including facts, events, dates, times, and the people involved.

A dedicated and independent representative will arrange for an initial confidential interview with you to discuss the areas of concern. You will be expected to provide as much information and supporting detail as you can in relation to the disclosure being made. Failure to do this may hinder any subsequent investigation and raise doubts about the genuineness of your belief in that disclosure.

You are entitled to be accompanied at this meeting, and any other meetings held under this Policy, by a work colleague or trade union representative. You (and your companion, if appropriate) may be asked to keep the matter confidential whilst an investigation takes place.

We will investigate your concerns in full. We will keep you informed of our progress as far as we can, but there may be elements which we decide should remain confidential.

We will confirm the outcome of our investigation to you as far as we can. If you are dissatisfied with the process in any way, then you can raise this with David Smith Chairman (david.smith@cityenergy.co.uk)

5. Confidentiality

We discourage you from making anonymous disclosures as they are very difficult for us to investigate. We can't properly establish whether allegations are credible without being able to ask you for more details or clarification, and this makes it hard to reach an informed decision.

We will protect anyone who raises a concern in good faith, even if we do not agree that the allegations they raise are correct. You should feel able to openly raise issues with us under this Policy. However, we understand that the subject matter covered by whistleblowing can be sensitive. If you are concerned about reprisals, whether from colleagues or others, you should tell People Services who will be able to provide you with appropriate support and reassurance.

The sensitive nature of whistleblowing investigations means that, aside from those involved in the whistleblowing process set out above, we will try to keep your personal involvement confidential. There may be circumstances where we cannot do this, and in those circumstances, we will discuss the matter with you to explain our position.

6. Whistle Blowing Procedure

Once you have reported your concern via whistleblowing@cityenergy.co.uk 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.

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.

For the avoidance of doubt the following stages will normally apply:

Stage 1

- If you have a concern about a risk, malpractice, or wrongdoing at work, we hope you will feel able to raise it firstly with your line manager. This may be done verbally or in writing.
- Managers must help to create a climate where staff feel able to talk in confidence without the threat of disciplinary action being taken against them. The manager will identify the nature of the issue by undertaking a preliminary investigation.

Stage 2

- If stage 1 of the investigation and any resultant action does not resolve the matter, or if a concern involves the immediate line manager, the member of staff should raise the concerns by emailing whistleblowing@cityenergy.co.uk who will refer the case to a designated officer, who will be the point of contact for employees under this policy.

Where concerns are raised with the designated officer, they will arrange an initial interview which will, if requested, be confidential to ascertain the areas of concern.

At this stage, you will be asked whether you wish your identity to be disclosed and will be reassured about the protections in place to support you. You will also be asked if you wish to make a written statement. In either case, the designated officer will write a summary of the interview, which will be agreed by both parties.

A full investigation will be conducted by the designated officer, and the outputs of that investigation will be shared with you.

7. External disclosures

This Policy covers the actions of third parties such as suppliers, service providers and clients, as well as those of our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your line manager will be able to explain how you should proceed.

We strongly recommend that you seek advice before raising any concerns externally to understand the proper forum for doing so and to make sure that any disclosure of confidential information is made in accordance with applicable law.

8. Protection for whistleblowers

We will not tolerate any detrimental treatment (dismissal, disciplinary action, demotion, transfers, salary cuts, threats, or other unfavourable treatment) of individuals because they have raised a genuine concern under this policy or participated in an investigation into a concern.

City Energy Network will treat any such detrimental treatment as a disciplinary matter, which might lead to dismissal. However, nothing in this policy means that someone who has raised a concern under it cannot be managed (monitored, directed, disciplined, dismissed, etc.)

If you believe you have suffered detrimental treatment for having raised genuine concerns about wrongdoing at work or for having participated in an investigation into potential wrongdoing under this policy, you should raise a complaint under the City Energy Network grievance/complaints procedure.

We are committed to taking all complaints seriously and seek to deal with them promptly. If your complaint is upheld, you will be notified. The details of any action taken against the perpetrator as a result are usually confidential as between him/her and City Energy Network. Alternatively, we may request that you participate in addressing the matter via a mediation or similar process.

All whistleblowers must act in good faith. If we believe that you have raised issues under this Policy which you knew were untrue, in bad faith or maliciously, then we will deal with this as a disciplinary matter under our *Disciplinary Policy*. You may be subject to sanctions up to and including dismissal for gross misconduct.

9. Useful links and contacts

All associated and referenced policies can be located via Personology. Including but not limited to, Disciplinary Policy, Bribery Policy, Grievance Policy, Bullying & Harassment Policy.

For further advice on whistleblowing, confidentiality, and protection from reprisals please refer to <https://protect-advice.org.uk/>. Protect is an independent charity that also offers an advice line ([020 3117 2520](tel:02031172520)).

10. Responsibility of Whistleblowing Policy

Group People Services are responsible for the administration of the Whistleblowing Policy,

The SLT of City Energy Network has overall responsibility for this policy and David Smith, Chairman has day-to-day responsibility for it. This policy will be reviewed periodically.