ENGINEERED SYSTEMS (ELECTRICAL) LTD Unit 1 Waterside Industrial Park, Waterside Road, Leeds, LS10 1RW

WHISTLEBLOWING POLICY

PURPOSE:

ENGINEERED SYSTEMS (ELECTRICAL) LTD are committed to the highest standards of openness, honesty, and accountability. To be accountable and transparent we must have a mechanism to enable our employees to voice concerns in a responsible and effective manner.

SCOPE:

This policy offers protection to employees who disclose concerns provided they reasonably believe the disclosure is in the public interest. It is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not a mechanism to question financial or business decisions we have taken, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

CONTROL MEASURES:

If an employee of ENGINEERED SYSTEMS (ELECTRICAL) LTD discovers information that they believe shows serious malpractice, breaches of legislation, unethical behavior or wrongdoing within the organization, that they believe is in the public interest then this information should be disclosed internally without fear of reprisal. With this in mind we have arrangements in place to enable this to be done independently of line management if required, or to an employee's immediate supervisor. Employees should report their suspicions to a Director of the company.

ENGINEERED SYSTEMS (ELECTRICAL) LTD treat any disclosures in a confidential and sensitive manner. The identity of the individual making the allegation is kept confidential so long as it does not hinder any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

ENGINEERED SYSTEMS (ELECTRICAL) LTD understands that whistle-blowers are now able to bring a tribunal claim against colleagues who subject them to detrimental treatment because they spoke out. We are aware that we could be vicariously liable for such treatment unless we can show we took all reasonable steps to prevent it from occurring. This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible but shall be considered at the discretion of the Company. If an individual makes an allegation they reasonably believe is 'in the public interest' no action will be taken against that individual. When making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

If all internal arrangements have been exhausted, then information can be disclosed to External Bodies, but this should be the final option and not the first point of call. There is legal protection for employees against being dismissed, treated in a detrimental way or penalized as a result of publicly disclosing certain serious concerns.

CONSEQUENCES OF NON-COMPLIANCE:

Where an employee commits a clear breach of company rules relating to this policy, action will be taken under our disciplinary procedures as appropriate. If there is evidence of criminal activity, then the police will be informed. ENGINEERED SYSTEMS (ELECTRICAL) LTD will ensure that any internal investigation does not hinder any formal police investigations.

Signed By the Executive Responsible for Whistleblowing:

Michael Keith Managing Director Date: 28th August 2025