



WHISTLEBLOWING POLICY

We are committed to conducting our business in a responsible way and to ensuring that the public interest is safeguarded. We also encourage an open, transparent and safe working environment where colleagues feel able to speak up.



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WHISTLEBLOWING OR GRIEVANCE PROCEDURE?

The Whistleblowing Procedure allows **employees** and **third parties** to raise a potential concern about some form of wrongdoing which is happening, has happened or is likely to happen and is in the public interest. The wrongdoing might fall into one or more of the following categories:-

- A criminal offence (e.g. fraud)
- The breach of a legal obligation e.g. breach of contract
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate attempt to conceal any of the above
- Any concerns in relation to a breach of the Company's Policies on:
 - Sanctions
 - Anti-Money Laundering
 - Anti-Facilitation of Tax Evasion
 - Anti-Bribery and Corruption, or
 - Human Rights & Modern Slavery

Personal grievances or complaints which are not Whistleblowing as described above, should be raised through the [Grievance Procedure](#).

If you are unsure about whether the issue should be raised under this Policy, please contact one of the individuals or the Confidential Whistleblowing Hotline noted below.

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RAISING A WHISTLEBLOWING CONCERN

Raising a Concern Internally

Whistleblowing concerns should be raised as soon as possible. Protection (including legal protection) and support is available for Whistleblowers. Please see the 'Protection & Support for Whistleblowers' section below.

We encourage you to discuss the issue with your Line Manager or the People Team (if appropriate). Alternatively, you can raise the issue in writing to:-

- Sarah Caddy, Legal Director (email: sarah.caddy@nicholsplc.co.uk)
- Alan Williams, Non-Executive Director and Chair of the Audit Committee (email: Alan.Williams@nicholsplc.co.uk)

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Confidential Whistleblowing Hotline

If you would prefer to speak to an independent third party, you can contact Safecall who have been appointed to provide a Confidential Whistleblowing Hotline.

You can contact Safecall at any time in one of the following ways:

- by freephone on 0800 915 1571; or
- by webform reporting via Safecall's website, at the following link: [Safecall Portal](#).

Any Whistleblowing concerns raised with Safecall can be done so anonymously, semi-anonymously or openly. Once a Whistleblowing concern has been raised to Safecall, the Legal Director shall be notified and an investigation commenced and undertaken in the usual way.

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Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. Please note that whilst we will endeavour to keep your identity confidential for as long as possible, it may become necessary to disclose a Whistleblower's identity for a valid overriding reason.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we can't obtain further information from you and it is also more difficult to establish whether any allegations are credible. Knowing the identity of a Whistleblower also facilitates feedback to the Whistleblower in respect of action taken.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Legal Director or the Chair of the Audit Committee, or should contact the Confidential Whistleblowing Hotline, and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice from [Protect](#), the independent whistleblowing charity, who offer a confidential service. You can reach out to Protect on 020 3117 2520, or via their website at <https://protect-advice.org.uk/contact-protect-advice-line/>.

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Our Response

A record will be made of receipt of the disclosure and it will be investigated.

Once the investigation is completed, we will inform you, subject to any third-party rights, of the outcome of the investigation.

If you have any concerns or complaints about the manner in which you feel you are being treated because you made the disclosure, whether by the alleged wrongdoer or by any colleagues, you should raise this with either your relevant member of the Senior Leadership Team, the Legal Director, the People & Sustainability Director or by contacting the Confidential Whistleblowing Hotline. The matter will be investigated and may then be dealt with as a disciplinary matter in relation to the relevant individuals.

If you are dissatisfied with the outcome of the investigation, a Board Director will investigate. The decision of that person will be final.

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External Disclosure

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally (with the exception of the Confidential Whistleblowing Hotline).

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. 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 (other than the Confidential Whistleblowing Hotline).

As set out in the 'Confidentiality' section above, the independent whistleblowing charity, [Protect](#), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our own employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first and you should contact the Legal Director in such instance.

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Protection & Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Legal Director or People & Sustainability Director immediately, or contact the Confidential Whistleblowing Hotline. If the matter is not remedied you should raise it formally using our [Grievance Procedure](#).

Employees must not threaten or retaliate against whistleblowers in any way. If an employee is involved in such conduct they may be subject to disciplinary action.

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Abuse of this Procedure / Victimisation

Concerns should be raised in good faith and should not be raised to further a personal grievance or private dispute (where appropriate, issues like this should be dealt with through our [Grievance Procedure](#)).

Victimising employees who make a disclosure or deterring them from raising a genuine concern about fraud, corruption, malpractice or unethical conduct will be considered a serious disciplinary offence.

Abuse of this procedure by maliciously or mischievously raising unfounded allegations, either internally or externally, will be regarded as a serious disciplinary offence.

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Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/
Safecall (Confidential Whistleblowing Helpline)	Telephone reporting: 0800 915 1571 Web reporting: Safecall Portal

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