

# Whistle Blowing Policy

## INTRODUCTION

Ductile Castings Limited are committed to running our business with integrity and complying with all our legal obligations. We expect everyone who works for us to maintain the highest of standards. However, we acknowledge that it is possible that, from time to time, things may go wrong. The aim of this policy is to encourage you to raise any genuine concerns you might have about certain wrongdoings at work without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

## WHO THIS POLICY APPLIES TO

This policy applies to all employees, officers, workers, self-employed contractors, apprentices, and agency workers, together referred to as 'staff'.

## SCOPE

This policy is for making a disclosure of wrongdoing where you reasonably believe that the disclosure is in the public interest. You should not generally use this policy for complaints relating only to your own circumstances, such as the way you have been treated at work. In those cases, you should generally use the Grievance Policy or the Dignity at Work – Bullying & Harassment Policy, as appropriate.

## TYPES OF WRONGDOING ADDRESSED BY THIS POLICY

This policy covers the following types of suspected 'wrongdoing':

- a criminal offence, including bribery;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information concerning any of the matters listed above

## HOW TO RAISE A CONCERN

If you genuinely and reasonably believe that we, or any of our staff, or a third party such as one of our customers, clients, or suppliers have taken, are intending to take or have failed to take action that could lead or amount to such wrongdoing, you should, disclose this information verbally or in writing to a member of the management team or a company director. Any concerns about wrongdoing covered by this policy should be raised internally with the company in the first instance, as set out above, to allow us the chance to investigate and deal with them.

If you make such a disclosure, you should provide full details and, where possible, supporting evidence. Any concern raised under this policy will be investigated thoroughly, promptly, and confidentially.

Remember, too, that social media sites such as Instagram and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

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## DEALING WITH ALLEGATIONS OF WRONGDOING

If you disclose information in accordance with this policy, wherever reasonably practicable we will keep your identity confidential, if that is what you would like. We discourage anonymous disclosures (although we will still make every effort to investigate such disclosures), as proper investigation may be more difficult or impossible if we cannot obtain further information from you.

We will arrange a meeting with you as soon as possible to discuss your concern (unless you make an anonymous disclosure). We will investigate your allegation promptly. We may require your assistance during our investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale. We will aim to inform you of the outcome of the investigation as soon as practicable, and whatever action (if any) we consider to be appropriate. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, the outcome and/or any disciplinary action taken as a result.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not satisfied with the way in which your concern has been handled, you can raise it with the Managing Director, who will arrange any further investigation if they think it is appropriate.

More serious disclosures may be referred to an external prescribed person or body and may form the subject of an independent inquiry.

At any meetings held under this policy, you may be accompanied by a colleague.

## PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

No action will be taken against anyone who raises a genuine concern about wrongdoing in accordance with this policy.

We may take action, including where appropriate disciplinary action up to and including dismissal, against any person found to be:

- subjecting a person to a detriment or dismissing them for using this policy; or
- deterring a person from reporting genuine concerns under this policy, such as threatening or retaliating against them.

(Where the perpetrator is not an employee, the process we will follow will depend on the status of our relationship with them.)

If you believe you have received such treatment for using this policy, please speak with the HR Manager. If the matter is not remedied, you should raise it formally under the Grievance Policy or, if appropriate, Dignity at Work – Bullying & Harassment Policy.

Note that if we find that you have made false allegations maliciously under this policy, action may be taken against you, including where appropriate disciplinary action.

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## CONFIDENTIALITY, DATA PROTECTION AND RECORD KEEPING

We aim to deal with allegations raised under this policy sensitively and with due respect for the privacy of the individuals involved. You should treat as confidential any information communicated in connection with an allegation made under this policy. If you are accompanied at any meeting under this policy by a colleague, they must also respect the confidential nature of the meeting.

Conducting investigations and meetings under this policy involves us processing the personal data of the individuals concerned. We use this personal data in order to investigate and deal with whistleblowing allegations. Depending on the context, our legal grounds for doing so could be that it is necessary:

- to comply with our legal obligations and for the performance of the employment contract (for example, to investigate and deal with allegations of wrongdoing in accordance with our duties towards staff, including our duty of trust and confidence to our employees, or our duty to prevent sexual harassment at work).
- in our legitimate interest to deal effectively with whistleblowing allegations, whether you are the subject of them or are otherwise connected to the issues raised
- in our recognised legitimate interest to detect, investigate or prevent crime.

Special category data<sup>1</sup> and data relating to criminal offences or convictions may occasionally need to be processed under this policy – for example, if a staff member raises an allegation of wrongdoing in the company which involves the impact of a suspected health and safety breach, or if a worker requires a reasonable adjustment to the operation of this policy to accommodate a disability. Depending on the context, our additional legal conditions for using such data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; to establish, exercise or defend legal claims; the individual making the disclosure has manifestly made the information public; or it is in the public interest to detect or prevent unlawful acts.

Where we take witness statements from staff with information about the allegations being investigated under this policy, such statements will be treated confidentially and will only be shared with individuals who need to be involved in the investigation and any follow-up action. This will ordinarily be HR and the person/people conducting investigations. In addition, if in the course of investigations under this policy it seems that misconduct has taken place which requires investigation under our Disciplinary Policy, witness statements taken under this policy may be used in any subsequent disciplinary matter and may therefore be shared with the person/people conducting investigations and hearings, as well as the employee whose conduct is the subject of disciplinary proceedings, to enable them to prepare for the hearing and respond to the allegations against them.

We will ordinarily keep records of allegations raised under this policy, details of investigations and any follow-up action. We will decide how long records should be retained in accordance with the criteria set out in our main employee privacy notice.

More general information, including details of who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns is contained in our

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<sup>1</sup> (i.e. personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sex life or sexual orientation, genetic data, or biometric data that is used to identify an individual)

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employee/staff privacy notice, which can be accessed via <https://castings.plc.uk/corporate-governance/corporate-responsibility/gdpr/>.

### Status of this procedure

This procedure does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Signed on behalf of Ductile Castings Ltd

DATE:

A handwritten signature in black ink, appearing to be 'D. D. O.', written over a horizontal line.

17/10/2026.