

## LAST MILE INFRASTRUCTURE GROUP LIMITED

### POLICY DOCUMENT: WHISTLEBLOWING POLICY

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#### DOCUMENT STATUS

This is a controlled document. Whilst this document may be printed, the electronic version posted on the intranet is the controlled copy. Any printed copies of this document are not controlled.

As a controlled document, this document should not be saved onto local or network drives but should always be accessed from the intranet.

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#### 1. GENERAL

- 1.1. Last Mile Infrastructure Group Limited (“Company”) designs, installs, owns and operates multi-utility infrastructure networks including gas, electricity, water and wastewater, as well as smart meters, connecting new build properties across the United Kingdom.
- 1.2. Whistleblowing is the term used when a worker (an employee, former employee or agency worker, hereinafter collectively referred to as “staff”) passes on information concerning wrongdoing. We call that “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessarily) be something they have witnessed at work. Staff are often the first people to witness any type of wrongdoing. The information that staff uncover could prevent wrongdoing, which may damage Company performance or reputation and could even save people from harm or death.
- 1.3. Sometimes a member of staff believes they are blowing the whistle when, in fact, their complaint is a personal grievance. Staff who make a disclosure under the Company’s Whistleblowing Procedure should believe that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually regarded as a protected disclosure and staff should refer to the Whistleblowing Procedure to verify the position in relation to their particular disclosure or complaint.

#### 2. POLICY STATEMENT

It is the Company’s Policy to conduct its business with honesty and integrity and to maintain and continually improve a documented Whistleblowing Procedure in accordance with the requirements of the Department for Business Innovation and Skills’ Whistleblowing Guidance for Employers and Code of Practice (March 2015). In order to achieve this the Company is committed to:

- 2.1. Providing staff with clear and simple guidance explaining how to make a disclosure clearly identifying a range of alternative persons who can be approached by staff that want to raise a disclosure and ensuring that staff at all levels of the organisation support and encourage whistleblowing.

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- 2.2. Creating an open, transparent and safe working environment where staff feel able to speak up without fear of reprisal, knowing that the Company will treat all disclosures consistently and fairly, will take all reasonable steps to maintain the confidentiality of the person making the disclosure (providing it is lawful to do so), will investigate promptly and will take action.
- 2.3. Giving feedback to staff who make a disclosure wherever it is possible and appropriate to do so subject to other legal requirements and following receipt of a disclosure, providing an indication of timings for any actions or next steps.
- 2.4. Supporting staff who make a disclosure with access, as appropriate, to mentoring, advice and counselling.
- 2.5. Maintaining records of the number of whistleblowing disclosures received and their nature as well as the date and content of any feedback provided.
- 2.6. Consulting with staff and providing appropriate information, instruction and training to ensure all staff and contractors are aware of whistleblowing law. Undertaking an ongoing programme of audit and ensuring that enough resource is allocated as required for the implementation of this Policy.
- 2.7. Communicating this Policy to staff, contractors, customers, the general public and other interested parties.

**3. SCOPE**

- 3.1. The Company and all related subsidiary undertakings are within the scope of this document.

**4. DEFINITIONS**

- 4.1. Unless a contrary intention is evident, or the context requires otherwise, words or expressions contained in this document shall have the same meaning as set out in the Articles of Association of the Company and the following defined terms shall have the specific meanings given to them below:

Board	means the Chairperson, Executive Directors and Non-executive Directors of the Company.
Chairperson	means a Member of the Board who is appointed pursuant to article 11 of the Company’s Articles of Association.
Chief Executive Officer	means a Member of the Board who is appointed pursuant to article 20.1 of the Company’s Articles of Association and so designated.
Committee	means a committee appointed by the Board, which reports to the Board.
Company	means Last Mile Infrastructure Group Limited.

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**Company Secretary** means the person who is appointed pursuant to article 72 of the Company’s Articles of Association.

**Employee** means a person paid via the payroll of the Company, or for whom the Company has responsibility for making payroll arrangements, but excluding Non-executive Directors.

**Executive Director** means a Member of the Board who is appointed pursuant to article 20.1 of the Company’s Articles of Association.

**Non-executive Director** means a Member of the Board who is appointed pursuant to article 20.2 of the Company’s Articles of Association.

**Policy** means this policy document.

**5. ROLES AND RESPONSIBILITIES**

5.1. The Board of Directors have overall responsibility for maintaining the corporate governance framework of the Company, including this document.

5.2. The Company Secretary has responsibility for:

5.2.1. Publicising the existence of the corporate governance framework and all associated controlled documents;

5.2.2. Ensuring all corporate governance framework documents, policy documents and Committee terms of reference are published on the intranet;

5.2.3. Maintaining a register of all corporate governance framework documents, policy documents and Committee terms of reference;

5.2.4. Ensuring all corporate governance framework documents, policy documents and Committee terms of reference are reviewed no later than their agreed review date.

5.3. All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Operating Officer who fulfils the function of Whistleblowing Officer for the purposes of this policy.

**6. DISTRIBUTION AND IMPLEMENTATION**

**6.1. Distribution Plan**

6.1.1. This document will be made available on the Company intranet and internet site.

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6.1.2. A global communication will be issued to all employees notifying them of the release of this document.

**6.2. Training Plan**

6.2.1. A training needs analysis will be undertaken with employees affected by this document.

6.2.2. Based on the findings of that analysis appropriate training will be provided as necessary.

**7. MONITORING**

**7.1. Compliance**

7.1.1. Compliance with this document will be monitored by the Environmental, Social and Governance (ESG) Committee.

7.1.2. This Policy will be reviewed annually.

**8. ASSOCIATED DOCUMENTATION**

8.1. PRO001 – Whistleblowing Procedure.

**9. REFERENCES**

9.1. None.

**APPENDIX 1 VERSION CONTROL TRACKER**

Version	Date	Author Job Title	Status	Comments
V00.01	03/10/2019	Chief Executive Officer	Draft	First draft for comment
V00.02	03/10/2019	Chief Operating Officer	Draft	Second draft for comment
V01.02	15/10/2019	Chief Operating Officer	Final	Final version agreed
V02.01	02/09/2020	Chief Operating Officer	Draft	Revised draft for comment
V02.01	07/10/2020	Chief Operating Officer	Final	Final version agreed
V03.01	31/08/2021	Risk and Compliance Advisor	Draft	Revised draft for comment
V03.01	05/10/2021	Chief Operating Officer	Final	Final version agreed

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