

# UK Whistleblowing Policy

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This policy has been prepared to update and consolidate the National Express UK Whistleblowing Policy.		

Policy Statement:
<p>National Express is committed to maintaining the highest standards of honesty, integrity, openness and accountability and recognises that you have an important role to play in achieving this goal.</p> <p>Members of the workforce will usually be the first to know or suspect when another member of the workforce is doing something wrong, but they may feel worried about voicing their concerns.</p> <p>This policy encourages members of the workforce to report their concerns about any wrongdoing they reasonably believe is or may be happening in any of our UK businesses, to provide guidance on how to raise such concerns and to explain the support and protection they can expect if they raise such concerns.</p> <p>National Express does not believe that it is in anyone’s interest for anyone with a reasonable belief of wrongdoing to remain silent, not least as by raising concerns people may assist in putting a stop to wrongdoing and thereby help to protect National Express’ people, assets and reputation.</p>

Who is covered by this policy?
<p>This policy applies to all National Express companies established in the United Kingdom (“NX UK Companies”) and to all of their employees, consultants, contractors, agency workers and other persons providing personal services to NX Companies (“NX UK Persons”).</p>

What is whistleblowing?
<p>Whistleblowing is where you tell someone in a position of authority in an organisation about something that you reasonably believe is going on within the organisation which involves some form of wrongdoing and where you also reasonably believes that you are acting in the public interest by doing so.</p> <p>Wrongdoing may include past, present of likely future:</p> <ul style="list-style-type: none"> <li>○ actions which endanger the health or safety of any of our passengers, members of the public or members of our workforce;</li> <li>○ actions which cause unlawful damage or danger to the environment;</li> <li>○ criminal offences, including theft, fraud, tax evasion, bribery and slavery;</li> <li>○ failure to comply with legal obligations;</li> <li>○ harassment or victimisation;</li> <li>○ financial or asset mismanagement;</li> <li>○ breach of our internal policies or procedures;</li> <li>○ unauthorised disclosure or use of confidential information or personal data;</li> <li>○ actions likely to damage our reputation; and</li> <li>○ actions which are intended to conceal any of the above.</li> </ul>

Whistleblowing is not raising concerns about your employment or engagement, unless the concern involves some form of wrongdoing and you are raising it in the public interest (rather than your own personal interest).

### **Raising a concern**

In most cases, we hope that you will be able, and we encourage you, to raise any concerns you have about any wrongdoing with your line manager or, alternatively, with your local HR representative. This is often the most efficient and effective way of bringing your concerns to the attention of those who are best able to deal with them.

In particular, we strongly encourage you to raise any concerns you have about there being an immediate risk to the health or safety of our passengers, members of the public or members of our workforce to your supervisor or line manager so that the situation can be addressed straightaway.

However, if you have tried to raise your concerns with your supervisor, line manager or HR representative and you consider that they have not responded appropriately or if you do not feel able to raise your concerns with them, including if this is because you suspect your line manager or HR representative is involved in the wrongdoing, then you should report your concern either to a more senior manager or a member of the Legal team or otherwise by calling the Whistleblowing Helpline on 0808 234 0137.

This Helpline is run by an independent third party provider who specialises in this kind of service and who mans the Helpline with qualified advisers who can discuss your concerns with you. The Helpline is toll free and is available 24 hours a day, seven days a week.

You can provide your name and contact information or remain anonymous if you wish. Please be aware that if you remain anonymous, we will not be able to provide you with feedback as easily and it may be more difficult for us to investigate your concern.

You will be given a report number and a contact date when you can call back to seek any available feedback. You should keep these safe. This is especially important if you have chosen to remain anonymous as this is the only way that we can maintain contact with you.

Please remember however that, if you have a grievance about your employment or engagement, you should, if you are an employee, raise such grievance in accordance with the NX UK Grievance Procedure or, if you are another type of worker, with the NX UK person who you report to in that capacity, as these are the appropriate channels for addressing such matters.

### **How we will handle the matter**

We will take all cases of genuine whistleblowing seriously.

If you raise a concern with your supervisor, line manager or HR representative, they will review it or they will raise it with other appropriate manager(s) who are not connected with the wrongdoing to consider what action should be taken.

If you raise a concern through the Whistleblowing Helpline, a report will be prepared and sent to the appropriate manager(s) who is/are not connected with the concern for review and careful consideration of what action should be taken.

Depending on the nature of your concern, this may mean an internal inquiry or a more formal investigation, including referral to an appropriate external person, such as independent investigators or the police. Please

be aware that inquiries and investigations can take time and the outcome of investigations will often depend on the evidence that is identified.

If we need further information from you, we will contact you directly if you have given your name and contact details or, if you have chosen to remain anonymous, we will ask you to provide this information through the Whistleblowing Helpline when you call the Helpline number back on the contact date given to you. We may ask you how you think your concern should best be dealt with. If you have a personal interest in the matter we would ask that you tell us at the outset. Whilst we will try to give you as much feedback as possible, we may not be able to give you specific details as this could infringe upon the privacy of another individual or it could compromise an ongoing investigation. We cannot guarantee that we will respond to all concerns in the way that you might wish, but we will handle the matter fairly, proportionately and consistently.

The Boards of Directors of the principal NX UK Companies regularly review this policy, the NX UK whistleblowing procedures and the reports arising from concerns raised. In addition, the Board of Directors of National Express Group PLC routinely reviews our whistleblowing procedures to seek to ensure they are effective and the reports arising from material concerns raised.

### **Protection and support**

It is understandable that you may be worried about raising a concern. However, we encourage openness and will support people who raise any genuine concerns in accordance with this policy, even if they turn out to be mistaken. We do not support people who maliciously raise concerns (i.e. about matters which they know to be untrue) or which they raise for ulterior motives (i.e. motives other than acting in the public interest or the interests of National Express Group).

If you raise a genuine concern under this policy, you will not suffer any form of detriment treatment as a result. Detrimental treatment includes dismissal, disciplinary action, threats, harassment or other unfavourable treatment connected with raising a concern.

NX UK Persons must not act unfavourably against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

### **What not to do**

As noted above, you should not act maliciously by raising concerns which you know to be untrue or where your intention is not to act in the public interest or in the interests of the National Express Group.

Where you have reasonably believe there is wrongdoing, you should not instigate your own investigation without first consulting with your line manager. You should also not spread rumours about the wrongdoing nor should you 'tip off' the person(s) you know or suspect to be involved in the wrongdoing, either before or after reporting a concern.

If you do these matters, this could result in a grievance being raised and/or disciplinary action being taken against you.