



Severn Group

Speak Up & Whistleblowing Policy

JULY 2022

Introduction

Severn Group aims to conduct its business with the highest ethical standards of honesty and integrity and recognises that its directors, officers, workers, employees, contractors and agency workers have an important role to play in maintaining this aim. Anyone concerned about any form of malpractice, improper action or wrongdoing by the Group or its employees is strongly encouraged to report the matter.

We believe an environment in which individuals feel able to raise any matters of genuine concern internally without fear of disciplinary action or recrimination being taken against them is essential. The concern will be taken seriously and the matter investigated appropriately, and as far as it practicable, will be kept confidential (except where disclosure is required by law).

We want to encourage individuals to report suspected wrongdoing as soon as possible and have put this process in place to facilitate the reporting of any concern.

This process applies to all directors, officers, workers, employees, contractors and agency workers.

This Policy is non contractual and we reserve the right to update this Policy at any time to take into account changes in legislation and business need



We do the right things, in the right way

We commit to full compliance, but we also promote a wider business culture of good ethical practice and diversity. Defined by fairness and transparency, underpinned by inclusive communication to inspire trust and respect; we challenge and support one another to achieve our shared goals.

Requirement

What is Whistleblowing?

Whistleblowing is the disclosing of certain types of wrongdoing or dangers at work. Such disclosures may include:

- Criminal activity
- Failure to comply with any legal obligation
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Bribery
- Financial fraud or mismanagement
- Breaches of competition law or anti-competitive practices
- Breach of the Severn Code of Conduct, including a Human Rights grievance
- Conduct likely to damage the reputation of Severn
- Unauthorised disclosure of confidential information
- Deliberate covering up of wrongdoing

A whistleblower is a person who raises a genuine concern relating to any of the above.

However, if you are an employee and have a personal grievance (e.g. a complaint relating to your conditions of employment, how you have been treated at work and/or your personal circumstances) these are not covered by this process. Concerns of this nature should be raised in line with the Company's HR policies and Procedures and not reported via this mechanism.

How to report a concern

We would hope that most individuals would feel that they could raise any concerns of this nature, in the first instance, directly with their line manager. However, if you feel that you are unable to for whatever reason, you should contact one of the following;

Legal Counsel	Compliance@severnvalve.com
CEO	CEO@severnvalve.com

Safecall - Our confidential totally independent external reporting service (see details below).

Requirement

Safecall - Independent Hotline and Web-Reporting

Safecall have been appointed by Severn to provide an independent reporting telephone hotline and on-line reporting system. Safecall have been established since 1999 and help their client portfolio of national and international organisations enhance their culture of integrity and openness.

If you feel you need to raise an issue outside of your immediate working environment, or if you feel after reporting the concern locally, the matter remains unresolved, you should contact the independent reporting service, managed by Safecall.

The Hotline numbers to use are set out below or use the link to report the issue online;

www.safecall.co.uk/report



Country	Phone number	Country	Phone Number
UK	0800 9151571	India	000 800 440 1256
Australia	1800 312928	Ghana	+44 191 516 7764
UAE	8000 4413376	Qatar	8000 250
Kazakhstan	8800 3333 499	Saudi Arabia	800 8442067
USA	1 866 901 3295	Malaysia	1800 220 054

If you wish to report your concern in writing, please send any correspondence marked for the attention of Legal Counsel at the address listed below, this will ensure it is dealt with in a prompt and effective manner.

Contour Technologies Limited
Heywoods Industrial Park
Birds Royd Lane
Brighouse
HD6 1NA

The Approach

Confidentiality and Anonymity

Normally, the best way to raise a concern is to do so openly and Severn would hope that you feel able to voice any concerns without the need to do so anonymously. Openness makes it easier for us to assess the issue, obtain more information and thoroughly investigate the matter. However, if you want to raise your concern confidentially, or you wish to give your name on the condition it is not revealed without your consent, please make this clear when making your report.

Once you have reported your concerns either via the phone or on-line to Safecall, you will be assigned a unique username. This username can be used in conjunction with a password known only to you. The username and password enable you to follow up on your report should you wish to do so.

Please keep in mind that proper investigation of any concern raised can be more difficult or impossible if we cannot obtain further information from you. By providing you with this username it allows for confidential dialogue between both parties should there be any further questions we wish to ask. It also provides you with the opportunity to check for any feedback.

Every effort will be made to keep it confidential, except where disclosure is required by law as this is different between countries. If it is necessary for anyone investigating your concern to know your identity, it will be discussed with you first.

This Procedure provides an internal mechanism for reporting, investigating and remedying concerns in the workplace. In most cases you should not find it necessary to alert anyone externally and rarely if ever would it be appropriate to alert the media.

If you are in any doubt about whether to raise a concern you can seek advice from Protect (UK), the independent whistleblowing charity, who offer a confidential helpline. Their contact details are;

Helpline - 44(0) 203 117 2520

Email – whistle@pcaw.co.uk

Website – www.pcaw.co.uk

The Approach

Investigation

Safecall will send a detailed report to Severn of all concerns raised. In most circumstances, they are received within 24hrs of the report being made. An escalation process is in place depending upon the seriousness of the report, to raise concerns immediately as a matter of urgency should it be required.

Depending upon the nature of the report, it may involve a full investigation or it may be passed on to the most appropriate area of the business to follow up and respond accordingly. On occasions it may be necessary to have the matter reviewed by an external independent body.

If we need help from you investigating the issue, we will be sensitive in seeking your assistance via Safecall and will support you through the process. Where appropriate, we will keep you informed of any progress. However, sometimes the need for confidentiality may prevent us from discussing the precise nature of our actions, specific details of the investigation or any action taken. You should treat any information about the investigation as confidential.

What safeguards are in place for you if you "blow the whistle?"

The legal protections in relation to whistleblowing are different in each country in which Severn operates. In any event, you should satisfy yourself that in reporting your concerns through this process, you genuinely believe that the information or allegations are true.

There are strict legal requirements which must be met for whistleblowing protections to apply. This includes requirements as to who the disclosure or concern should be made to (this should usually be Severn in the first instance) and a requirement that the disclosure or concern should be made in the public interest and not solely for personal gain.

Regardless of whether any legal protections apply, Severn encourages all employees to report any suspected wrongdoing immediately upon becoming aware of it. Severn recognises that there may be some cases where no wrongdoing is found once a concern has been reported and duly investigated. Protection will be given, and no disciplinary action will be taken if the disclosure is genuine and you believed the information provided to be true.

At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



Customer



Integrity



Excellence



Accountability



SEVERN
Superior Valve Engineering