

WHISTLEBLOWING/SERIOUS CONCERNS POLICY

March 2021

Go East Anglia (comprising Konectbus; Norwich Park and Ride; Hedingham; and Chambers) wishes to create a working environment where everybody feels able to raise legitimate concerns about a possible wrong-doing which is in the public interest, without fear of reprisals, including victimisation and dismissal.

This policy does not form part of any employee's contract of employment and Go East Anglia may amend it at any time.

Who does the policy apply to?

This policy applies to all individuals working at all levels of Go East Anglia ("GEA"), including senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff (collectively referred to as "staff" in this policy).

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to GEA's activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

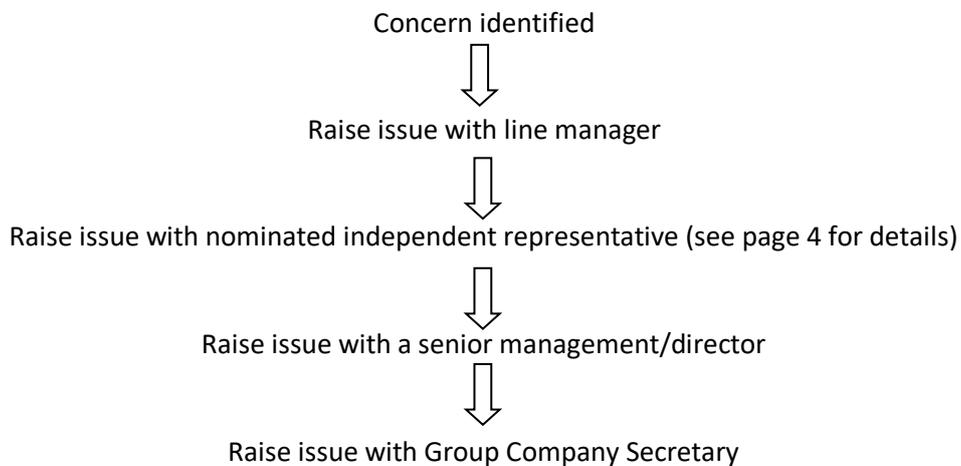
Protected disclosures

There may be circumstances where an individual has concerns with respect to a particular aspect of GEA's business/service or the activities of its employees or officers, which he/she believes may affect and/or prejudice the interests of the public and/or breach any current legislation. Set out below are examples of wrong-doings which will be covered by the policy. These wrong-doings may have happened in the past, may currently be happening or may be likely to happen:

- A criminal offence has been committed;
- There has been a failure to comply with legal obligations;
- A miscarriage of justice has occurred;
- The health or safety of someone is being endangered or harmed;
- The environment is being damaged;
- Fraud, corruption, bribery or other financial irregularity is occurring;
- Confidential or commercially sensitive information is being used improperly;
- A conflict of interest or unethical behaviour or malpractice has occurred;
- Inside information on dealing in the shares of The Go-Ahead Group plc is being used improperly;
- There has been a failure to disclose information or documents have been improperly destroyed which should be disclosed to others in GEA or the wider Go-Ahead Plc Group or to appropriate regulators; and
- There has been deliberate concealment of any of the above.

How to raise concerns

Summary flowchart:



If individuals have a serious concern which they wish to raise, they must do so by following this policy. Staff are encouraged to report suspected wrongdoing as soon as possible. Every disclosure under policy will be treated seriously and will be fully investigated.

Where an individual wishes to raise or discuss any issues which might fall under the 'Protected disclosures' section above he/she should contact his/her line manager in the first instance who will treat the matter in confidence.

However, where an individual would prefer not to raise it with their line manager for any reason, they should contact, as soon as possible, his/her nominated independent representative, contact details which can be found at the end of this policy. If this would not be appropriate, then the concern should be raised with a Senior Manager or Director in the company. If, in extremely rare instances, it would not be appropriate to contact his/her line manager, nominated independent representative, Senior Manager or Director, an email should be sent to the Group Company Secretary (carolyn.ferguson@go-ahead.com).

For concerns in relation to fraud, bribery or corruption, under Section 5 of the Group's Policy and Procedures Manual, the Group / Regional Compliance Officer must also be notified immediately.

Legal grounds for processing

Under Article 6 of GDPR, organisations need to ensure that any processing of personal information is undertaken under one of the six legal grounds for processing. In the context of whistleblowing, we would expect such grounds to be either (i) where processing is necessary for compliance with the law or (ii) where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

We would not usually rely on the legal ground of consent to process personal data in the context of whistle-blowing. Advice should be sought from the Group Data Protection Officer if this is the case, as it affects the rights that data subjects have over their personal data.

Procedure

GEA recognises the sensitivity of raising such issues and we undertake to treat details of individuals who report matters with the utmost confidence. All concerns raised under this policy will be investigated.

Once a disclosure has been made, the issue will be investigated and the person who made the disclosure will be kept informed of progress.

GEA will ensure that only personal data that is adequate, relevant and limited to what is necessary is processed.

It is not appropriate to set a timeframe by which such investigations will be completed as the diverse nature of the possible types of disclosure makes this unworkable. However, GEA will deal with all disclosures in a timely manner.

The person(s) making the disclosure will be advised of the outcome of the investigation as soon as practicable.

Confidentiality

Every effort will be made to keep the identity of the person who has raised concerns in accordance with this policy confidential. However, in certain circumstances, his or her identity may need to be disclosed, but this will only happen when it is absolutely necessary. Reports must only be seen by authorised persons and must be kept securely to protect confidentiality.

Authorised people investigating a report must take steps to ensure any personal data is kept safe that any person accused is subject to a fair and independent investigation.

Timely processing

GEA will not keep personal data longer than is necessary for the purpose or purposes for which it was collected. Personal data from a whistleblowing report will only be retained for the duration of the investigation and resolution of the issue, if it is legally required to be retained or it is required to establish, defend or bring a legal claim.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrong doing in the workplace. In most cases staff should not find it necessary to alert anyone externally.

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. GEA strongly encourages staff to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

Protection and support for whistleblowers

GEA aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. If an individual has suffered any such treatment, they should inform their line manager or nominated independent representative immediately.

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

If GEA conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

Grievance procedure

This policy should not be used for complaints relating to an individual's own personal circumstances, such as the way they have been treated at work or a potential breach of their employment contract. In those cases, staff should use the grievance procedure.

Who will not be protected by this policy?

The following people will not be protected by this policy:-

- Individuals whose disclosures are not made in the public interest;
- Individuals who do not reasonably believe that the allegation to be true;
- Individuals who make the disclosure principally for the purpose of obtaining payment or personal gain;
- Individuals who make the disclosure principally with malicious intent; or
- Individuals who do not raise their concerns in accordance with this policy before making a disclosure to an external party.

If there is any doubt as to how to proceed, please contact any of the people named in this document who will be able to provide guidance.

General Data Protection Regulation (GDPR)

GEA is committed to protecting the privacy and security of your personal information. For information on how we collect and use personal information about you in accordance with GDPR together with your data subject rights including subject access requests, please refer to the GEA Privacy Notice – “GDPR privacy notice for employees” - which is available from the HR department, the Data Protection Manager (shaun.tooth@goeastanglia.co.uk) or on our website.

Please note that, in a whistleblowing context, data subject rights may be restricted for the prevention, investigation, detection or prosecution of criminal offences or civil law claims.

Contacts:

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| Nominated Independent Representative | Shaun Tooth Shaun.tooth@goeastanglia.co.uk |
| Director | Jeremy Cooper Jeremy.cooper@goeastanglia.co.uk |
| Group Company Secretary | Carolyn Ferguson Carolyn.ferguson@go-ahead.com |
| Public Concern at Work (Independent whistleblowing charity) | Helpline: (020) 7404 6609 E-Mail: whistle@pcaw.org.uk Website: www.pcaw.co.uk |

Amendments to Whistleblowing Policy

The Whistleblowing Policy is not contractual and may be amended by Go East Anglia at any time at the discretion of Go East Anglia. Employees will be notified of any changes, however it is incumbent upon employees to ensure they read and understand the updated Whistleblowing Policy.

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