



## WHISTLE-BLOWING POLICY

### 1 Introduction

- 1.1 Tideway is committed to conducting all aspects of business with honesty and integrity to maintain high standards. It is essential that everyone working on the Thames Tideway Tunnel Project (the “Project”) shares this aim and feels able to raise any concerns about the way business is being conducted quickly, confidentially and without concern. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 This policy and its associated procedure have been developed to safeguard the interests of the Project, Tideway employees, contractors, sub-contractors, consultants, agents; third party suppliers, partners, main work contractors, framework providers and anyone working on the Project, regardless of employment route or parent company.
- 1.3 The Board has ultimate responsibility for setting, reviewing and enforcing this policy and mandates the Audit and Finance Committee to manage it day-to-day.

### 2 Application

- 2.1 This policy applies to BTL and Jacob’s Engineering Group<sup>1</sup> including all employees (including part time), consultants and direct contractors of each company working on the Thames Tideway Tunnel Project (the “Project”) and any other person who provides services for or on behalf of BTL (“Tideway”).

### 3 Objective

- 3.1 The purpose of this policy is for Tideway and anyone working on the Project to be:
- a. Encouraged to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
  - b. Reassured that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 3.2 Details on how this policy will be implemented and how to raise concerns can be located in the *Whistle-blowing Procedure* <sup>2</sup>.

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<sup>1</sup> Providing services through CH2M Hill UK Limited

<sup>2</sup> [Whistle-blowing Procedure](#) ref: 2260-TDWAY-TTTUN-990-ZZ-PP-700008

## 4 What is whistle-blowing?

- 4.1 Whistle-blowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- a. criminal activity;
  - b. failure to comply with any legal or professional obligation or regulatory requirements;
  - c. miscarriages of justice;
  - d. danger to health and safety (including drugs and alcohol concerns);
  - e. modern slavery;
  - f. tax evasion;
  - g. bullying and harassment
  - h. damage to the environment;
  - i. bribery under the Bribery Procedure;
  - j. financial fraud or mismanagement;
  - k. negligence;
  - l. breach of the internal policies and procedures;
  - m. conduct likely to damage Tideway's reputation;
  - n. unauthorised disclosure of confidential information;
  - o. other workplace specific concerns;
  - p. the deliberate concealment of any of the above matters.
- 4.2 A whistle-blower is a person who raises a genuine concern relating to any of the above. If you have genuine concerns related to suspected wrongdoing or damage affecting any activity ("a whistle-blowing concern") you should report it under this policy.

## 5 Overview of Tideway's approach

- 5.1 Whistle-blowing concerns usually relate to the conduct of the Project Members, but they may sometimes relate to the actions of a main works contractor or any third party, such as a supplier or partner.
- 5.2 Concerns regarding malpractice and misconduct within the Project, should be raised to the Project Member's Line Manager, wherever possible in line with the *Whistle-blowing Procedure* and *Whistle-blowing Guidance*.
- 5.3 All concerns raised will be reported to the Whistle-blowing Officer and the Director of Legal.
- 5.4 Project Members can also raise concerns to the following parties directly should they need to:
- a. The Whistle-blowing Officer;
  - b. The Director of Legal;
  - c. The Chairman of the Tideway Board Risk Committee; and/or

- d. The confidential external telephone hotline, which is run by an outside agency and confidentiality is assured;
- 5.5 Project Members will be offered a meeting to discuss their concerns and may be offered a colleague to attend alongside them to act as a support person.
- 5.6 An investigation will be carried out on all reported concerns, an investigator or team of investigators may be appointed including Project Members with relevant experience of investigations or specialist knowledge of the subject matter to establish the facts. The investigator(s) may make recommendations for change to enable Tideway to minimise the risk of future wrongdoing. The Whistle-Blowing Guidance outlines further details on how the investigation will be conducted.
- 5.7 All information about the investigation will be treated as confidential.
- 5.8 If it is concluded that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action.
- 5.9 Disclosures to a prescribed external body or person, as protected by the Public Interest Disclosure Act 1998, can be made provided:
  - a. Disclosures are made in good faith;
  - b. There is a reasonable belief the information and any allegations are substantially true; and
  - c. The matter falls within the description of matters for which the person or body has been prescribed.
- 5.10 The Whistle blowing Officer is responsible for recording the concern in Tideway's Whistle blowing log and monitoring concerns until they are resolved.
- 5.11 On behalf of the Director of Legal, the Whistle blowing Officer will report any whistle-blowing concerns which arise under this policy to the Audit and Finance Committee as they arise, at minimum on an annual basis.
- 5.12 The Director of Legal is responsible for the development, review and amendment of this policy and associated procedures and guidance documents. These will be reviewed annually irrelevant of any continual improvements to ensure accuracy.
- 5.13 Once this policy has been adopted, the Whistle-blowing Officer, the Programme manager and the Line Managers are required to communicate it to everyone affected across the entire Project.

## 6 Confidentiality

- 6.1 Project Members and everyone working on the Project should feel able to voice whistle-blowing concerns openly and confidentially under this policy. Every effort will be made to keep their identity secret.
- 6.2 Disclosures can be made anonymously and whistle-blowers who are concerned about possible reprisals if their identity is revealed can report concerns to the Whistle-blowing Officer.

## 7 Protection and support for whistle-blowers

- 7.1 The provisions of the Public Interest Disclosure Act 1998 protect whistle-blowers from being subjected to any detrimental treatment as a result of raising a

concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Whistle-blowing Officer should be informed immediately if any such treatment has been suffered.

- 7.2 Project Members must not threaten or retaliate against whistle-blowers in any way. If any Project Members are involved in such conduct, they may be subject to disciplinary action.



**Andy Mitchell**

Chief Executive Officer

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