

## **Grievance & Whistleblowing Policy: External Stakeholders**

### **INTRODUCTION**

Owen Mumford is committed to conducting its business with the highest standards of integrity, transparency and accountability. We recognise that our customers, suppliers, contractors and wider community partners may be affected by, or have concerns about, our activities.

We actively encourage external stakeholders to raise any concerns, whether they are complaints about how Owen Mumford conducts its business (*grievances*) or reports of serious wrongdoing (*whistleblowing*).

The purpose of this policy is to provide:

- A clear and accessible process for external stakeholders to raise grievances or whistleblowing concerns.
- A commitment that all issues raised will be taken seriously, investigated impartially, and resolved wherever possible.
- Assurance that individuals who raise concerns in good faith will be protected from retaliation.

### **CONTACT LIST**

Concerns may be submitted through the following channels:

- **Email:** [ethics@owenmumford.com](mailto:ethics@owenmumford.com)
- **Email:** [whistleblowing@owenmumford.com](mailto:whistleblowing@owenmumford.com)

### **SCOPE**

This policy applies to all external parties who wish to raise a grievance or whistleblowing concern regarding Owen Mumford's activities.

### **APPLIES TO**

This policy applies to:

- Customers and clients.
- Suppliers and contractors (including subcontractors, consultants, and partners).
- Distributors and business partners.
- Community members or organisations impacted by Owen Mumford's operations.

### **POLICY DETAIL**

Distinguishing Grievances from Whistleblowing

#### ***Grievance:***

A complaint or concern about how Owen Mumford's activities directly affect you or your organisation.

### **Whistleblowing:**

Reporting of serious wrongdoing, risks, or misconduct that is illegal, unethical, or against company policy.

Both are equally important, and this combined policy ensures each is handled through an appropriate and fair process.

## **GRIEVANCE PROCEDURE**

### **What You Can Report**

- Health, safety, social, or environmental concerns.
- Concerns about product or service quality.
- Contractual or commercial concerns relating to fairness of treatment.
- Human rights or labour rights concerns.
- Misconduct, harassment, or discrimination by Owen Mumford representatives.
- Breaches of laws, regulations, or company commitments.

### **Our Process**

1. **Acknowledgement:** All grievances will be acknowledged within **5 working days**.
2. **Investigation:** Concerns will be reviewed and where appropriate, investigated by a manager or independent reviewer. You may be asked to provide further information to support the investigation. If a meeting is required, you are welcome to have a representative present.
3. **Resolution:** A written response or resolution will be provided within **30 working days**. If this is not possible, you will be informed of the reason and given a revised timeline.
4. **Confidentiality:** All grievances will be treated in confidence and only shared with those directly involved in resolving the issue.
5. **Potential Outcomes:**
  - a. Grievance upheld in full.
  - b. Grievance upheld in part.
  - c. Grievance not upheld.

In all cases, steps may be recommended to prevent similar issues in future. If you are not happy with the outcome of the grievance, you will have the opportunity to appeal the decision by submitting your appeal in writing to [ethics@owenmumford.com](mailto:ethics@owenmumford.com) within 5 working days of receiving the outcome letter, outlining the grounds for the appeal.

### **6. Record Keeping**

- Any notes related to the grievance will remain live on file for the period stipulated in the outcome letter and will remain on file for a period of 24 months.

## WHISTLEBLOWING PROCEDURE

### What You Can Report

- Fraud, bribery, or corruption.
- Human rights, labour rights, or environmental violations.
- Serious breaches of health and safety.
- Discrimination, harassment, or unethical conduct.
- Concealment of wrongdoing or deliberate cover-up of risks.

### Our Process

1. **Acknowledgement:** Concerns will be acknowledged within **5 working days** (unless submitted anonymously).
2. **Investigation:** An impartial investigation will be conducted. Depending on the issue, this may involve senior management, external auditors, or regulators. You may be asked to provide further information to support the investigation.
3. **Resolution:** A written response or resolution will be provided within **30 working days**. If this is not possible, you will be informed of the reason and given a revised timeline.
4. **Outcome:** A written response will be provided within **30 working days**, or an explanation and revised timeline where more time is required. Anonymous reports will still be fully investigated, though we may not be able to provide direct feedback.
5. **Protection for Whistleblowers**
  - a. Owen Mumford will not tolerate retaliation against anyone who raises a concern in good faith.
  - b. Whistleblowers may remain anonymous.
  - c. Malicious or knowingly false reports will not be tolerated.

## CONFIDENTIALITY & FAIRNESS

All reports under this policy will be handled:

- With strict confidentiality.
- With impartiality and without bias.
- With respect for all parties involved.
- Where necessary, Owen Mumford may also notify or cooperate with relevant regulatory authorities.

## CONSEQUENCES OF RETALIATION

Any act of retaliation against an individual who raises a concern in good faith will be treated as a serious breach of this policy. Consequences may include disciplinary measures (up to and including termination of contracts or business relationships), reporting to regulators, and/or legal action where appropriate.

## INDEPENDENT ADVICE

External stakeholders who require guidance before raising a concern may contact **Protect**, a UK charity that provides confidential whistleblowing advice: [www.protect-advice.org.uk](http://www.protect-advice.org.uk) | Tel: 020 3117 2520

## APPENDIX 1: Grievance & Whistleblowing Procedure: External Stakeholders *Flowchart*

### **Stage 1.**

Concern Identified:

You have a grievance or concern relating to Owen Mumford's activities

### **Stage 2.**

Raise Your Concern:

Submit via email: [ethics@owenmumford.com](mailto:ethics@owenmumford.com) or [whistleblowing@owenmumford.com](mailto:whistleblowing@owenmumford.com)

### **Stage 3.**

Acknowledgement:

Owen Mumford acknowledges receipt within 5 working days

### **Stage 4.**

Review & Investigation:

An impartial investigation is initiated, confidentiality maintained

### **Stage 5.**

Outcome / Response:

Written response provided within 30 working days (or updated timeline)

### **Stage 6.**

Protection:

No retaliation for concerns raised in good faith.

Independent advice: Protect