

Whistleblowing Policy

Company: Connexion Developments Ltd

Issue Date: January 2026

Review Cycle: Annual or upon significant business change

1. Purpose

Connexion Developments Ltd is committed to conducting business with honesty, integrity, and accountability. This Whistleblowing Policy provides a clear framework for employees and other stakeholders to raise concerns about wrongdoing, malpractice, or unethical behaviour without fear of retaliation.

The purpose of this policy is to encourage the reporting of genuine concerns at an early stage and to ensure that they are properly addressed.

2. Scope

This policy applies to:

- All employees and directors of Connexion Developments Ltd
- Temporary staff, contractors, and agency workers
- Suppliers and other third parties who have a business relationship with the company

It covers concerns relating to activities connected with Connexion Developments Ltd.

3. What Is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or malpractice within the organisation.

Concerns may include, but are not limited to:

- Criminal activity
- Breach of legal or regulatory obligations
- Fraud, bribery, or corruption
- Health and safety risks or negligence
- Environmental damage
- Data protection breaches or misuse of information
- Attempts to conceal any of the above

This policy is intended for serious concerns in the public or organisational interest. It is not a substitute for normal grievance or disciplinary procedures.

4. Legal Framework

This policy is designed to comply with the Public Interest Disclosure Act 1998 (PIDA), which provides legal protection for workers who raise qualifying disclosures in good faith.

5. Our Commitment

Connexion Developments Ltd is committed to:

- Encouraging openness and transparency
- Treating all whistleblowing concerns seriously and fairly
- Investigating concerns promptly and proportionately
- Protecting whistleblowers from victimisation, harassment, or retaliation
- Maintaining confidentiality wherever possible

No individual who raises a concern in good faith will suffer any detriment as a result.

6. How to Raise a Concern

Concerns may be raised in the following ways:

- To your line manager
- Directly to senior management or a company director

Concerns may be raised verbally or in writing. Individuals are encouraged to provide as much factual information as possible to assist any investigation.

Anonymous reports will be considered, although this may limit the company's ability to investigate fully.

7. Confidentiality

All whistleblowing concerns will be handled sensitively and confidentially.

Information will only be shared where necessary to investigate the concern or where required by law.

8. Investigation and Outcome

All concerns raised under this policy will be assessed and, where appropriate, investigated.

Connexion Developments Ltd will:

- Acknowledge receipt of the concern
- Assess the nature and scope of any investigation required
- Take appropriate action based on findings

Where possible, feedback will be provided to the individual raising the concern, subject to confidentiality and legal constraints.

9. Protection from Retaliation

Retaliation against anyone who raises a concern in good faith will not be tolerated.

Any individual found to have subjected a whistleblower to detriment may be subject to disciplinary action.

10. Malicious or Vexatious Allegations

This policy is intended to protect individuals who raise genuine concerns.

Knowingly false, malicious, or vexatious allegations may result in disciplinary action.

11. Responsibilities

Management

Management is responsible for:

- Promoting awareness of this policy
- Ensuring concerns are handled appropriately
- Protecting whistleblowers from retaliation

Employees and Others

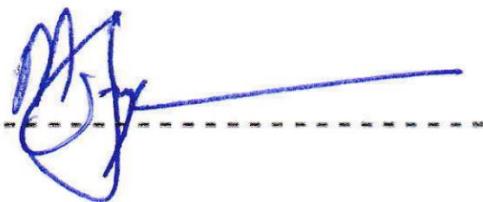
All individuals are responsible for:

- Raising concerns responsibly and in good faith
- Cooperating with investigations where required

12. Policy Review

This Whistleblowing Policy will be reviewed annually or following significant changes to legislation or business operations.

Approved by:



Managing Director

For and on behalf of Connexion Developments Ltd