



WHISTLEBLOWING POLICY

The Costain Group is committed to the provision of the highest quality services for, and for full accountability to, its customers, suppliers and employees.

Costain recognises that incidents of fraud, mismanagement or possible wrongdoing, while unlikely, may occur at work irrespective of the controls that have been put in place to prevent this.

Costain is committed to ensuring that any such malpractice is taken seriously, prevented and immediately dealt with if it should arise. Employees are often the first to realise that something is wrong in the workplace, but they may feel that they cannot express their concerns because it would be disloyal to their colleagues, or to the Company, or that they would be subjected to harassment or victimisation.

Costain encourages employees to raise their concerns about any malpractice at the earliest possible stage commonly known as 'whistleblowing'.


The Public Interest Disclosure Act 1998 (PIDA 1998) states that individuals who make qualifying disclosures of information in the public interest have the right not to suffer detriment by any act or omission of their employer because of that disclosure. This Policy is compliant with the PIDA 1998 and, provided that they follow the steps laid out in this Policy, employees will be able to raise genuine concern.

The Company confirms that, if an employee makes a disclosure of information, which in the reasonable belief of the employee is made in the public interest and without malice or a view to personal gain, and has reasonable grounds for belief in the concern:

- so far as is reasonably practicable, the employee's identity will not be disclosed at any time, unless necessary for the purposes of investigation or to comply with a legal obligation;
- the employee will not be subjected to any harassment, victimisation or disciplinary action as a result of raising the concern, provided they have complied in full with this policy;
- so far as is reasonably practicable, any supporting evidence relating to the concern will be kept secure and confidential at all times.

If, at any time, it is discovered that the employee has raised a concern maliciously, vexatiously or with a view to personal gain, or that they have breached the terms of this policy, pursuant to the PIDA 1998, the employee will lose the protection under this policy and could be subject to disciplinary action under the Company's Disciplinary Procedures.

This policy (and associated procedures) will be reviewed annually to ensure its suitability, adequacy and effectiveness.

Signed:


A. Wyllie CBE (Chief Executive Officer)

Date: 1st February 2018