

Whistleblowing Policy – ‘Speak Up’

PURPOSE

The purpose of this policy is to outline the requirements on Group companies to encourage employees to report suspected wrongdoing as soon as possible. Employees will be able to do this in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. This policy provides employees with guidance as to how to raise those concerns and aims to reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

SCOPE AND APPLICATION

This policy is managed by the Group General Counsel and Company Secretary, approved by the Pennon Group Board and enforced without discrimination across the Pennon Group and its subsidiary companies (“Group”).

GOVERNANCE

Even within the best organisations, there is sometimes the risk of people stepping over the line between appropriate and inappropriate behaviour. Our whistleblowing programme, called ‘Speak Up’, encourages our employees and contractors to raise concerns about any suspected wrongdoing. The Pennon Group Board is committed to conducting its business with honesty and integrity and expects all of us to maintain high standards of business ethics. Pennon has a number of policies on legal and ethical standards in place to support and guide you. These can be found on the Group Legal web page.

From time to time you may get aggrieved or become concerned over the actions of part of the business or a colleague. Pennon is keen to encourage an open, transparent and safe working environment where workers feel able to speak up and are supported if they do so.

If you witness or experience any wrongdoing at work, please report it. Your feedback could prevent further wrongdoing, which may damage the Group’s reputation and/or performance and could even save people from harm or death.

Policy

Pennon’s policy is to encourage all employees, officers, consultants, contractors, casual and agency workers to raise any concerns about suspected wrongdoing or unlawful or unethical conduct and that they are able to do so without the fear of reprisals.

What does ‘Whistleblower’ mean?

Whistleblowing is a term used when a worker passes on information concerning suspected wrongdoing. There are many examples of potential activities that a whistleblower should speak up about. These may include:

- Endangering someone’s health and safety
- Anything that is against the law
- Stealing or fraud
- Corrupt or dishonest activity
- Damage to the environment
- Covering up wrongdoing
- Abuse of authority
- Intentionally misreporting to a regulatory body

- Bullying / Harassment / Victimisation
- Tax evasion or the facilitation of tax evasion

Employees who whistleblow have certain protections under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998), including the right not to be dismissed or suffer any detriment at work as a result of making a “protected disclosure”. For the disclosure to be protected under the whistleblowing law, you must:

- A. reasonably believe that the disclosure shows that one or more of the following wrongdoings have occurred:
- a criminal offence; breach of
 - any legal obligation; a
 - miscarriage of justice;
 - danger to the health and safety of an individual;
 - damage to the environment; the deliberate concealment of
 - information about any of the above.
- B. Reasonably believe that the disclosure is “in the public interest”.

It is understandable that if you spot or experience any suspected wrongdoing you may be worried about possible repercussions. Pennon aims to encourage openness and will support employees who raise genuine concerns, even if they turn out to be mistaken.

How to Raise a Concern

As a first step, you should normally raise concerns with your immediate line manager.

If you do not feel able to talk to your line manager, you can tell:

- The Group General Counsel & Company Secretary
- The Group Deputy General Counsel

Details of these people are provided overleaf. If you feel uncomfortable about raising concerns internally, there is an external and completely confidential ‘speak-up’ hotline you can use. This service allows you to report by phone, web, email and/or recorded message. It offers language and translation capabilities and can be used by anyone on an anonymous basis.

The confidential telephone number to ring is: **0800 022 4118**.

If you are submitting a report via telephone you will need to use Pennon Group’s organisation code: **127547**.

The online portal can be found here: <https://pennonspeakup.speakup.report/SpeakUpPennon>

When you make a report, you have the option to leave your e-mail address if you’d like to get a notification when there is a response. We strongly encourage this as it makes it much easier to communicate and ensures that you can be kept up to date with the progress of the investigation. If you do choose to share your e-mail, it will be kept strictly confidential, and it is not accessible by the investigation team. It is only used so that you can be notified when there is a response waiting in the system.

If you choose not to provide your e-mail, it is essential to keep your Report ID and password secure and log back in to the portal regularly. This is the only way to access responses or to provide additional information related to your report.

Although you are not expected to prove the truth of your allegation, you will need to show that there are sufficient grounds for your concern.

If you do not feel that you can raise your concern in the above manner, alternative avenues (including raising

concerns to Ofwat in their capacity of a 'prescribed person' under the provisions of the Employee Rights Act 1996) are detailed on page 3 of this policy.

What happens next?

Once you have raised a concern the matter will be investigated and you will be informed of the findings. Pennon will take all reasonable steps to maintain the confidentiality of the reporter where it is requested unless it is legally not allowed to do so.

How the matter can be taken further

Pennon hopes you will be satisfied that the policy provides an appropriate way of dealing with concerns. If you are not satisfied and want to take the matter to outside bodies, such as regulators or the police, Public Concern at Work (an independent registered charity, details below) will be able to advise on your options.

Protection and support for whistleblowers

Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers will not suffer any detrimental treatment as a result of raising a concern and all reports to Speak Up are handled confidentially. If there is reasonable suspicion of a potential risk of retaliation, our Legal Compliance team may initiate its own investigation while maintaining the confidentiality of the information received.

All Speak Up incidents are directly reported to the Pennon Audit Committee and our independent Speak Up line offers confidential reporting and follow up processes for investigations are undertaken to prevent retaliation.

If you believe that you have been victimised as a result of raising a concern through SpeakUp, you should inform the Group General Counsel and Company Secretary or the Group Deputy General Counsel immediately.

Conversely, you must not threaten or retaliate against whistleblowers in any way and any involvement in such conduct may result in disciplinary action.

Contact details:

Group General Counsel and Company Secretary

Andrew Garard

asgarard@pennon-group.co.uk

Group Deputy General Counsel

Barry Matthews

bmatthews@pennon-group.co.uk

Speak-up Hotline

08000224118

<https://pennonspeakup.speakup.report/SpeakUpPennon>

Protect (an independent whistleblowing charity)

Helpline: 020 3117 2520

www.protect-advice.org.uk

Ofwat (prescribed person)

Helpline: 0121 644 7500

www.ofwatcaseportal.org.uk/submitanenquiry/

VERSION HISTORY

This section of the policy should be completed to detail changes made to the policy.

VERSION	STATUS	AREA OF CHANGES	DESCRIPTION OF CHANGES	APPROVED BY	DATE OF RELEASE DD/MM/YYYY
2.2	Current	Partial	Updates to hyperlinks and direction on whistleblower reporting	Pennon Board	25/09/2025
2.1	Retired	Partial	Updates to include new whistleblower platform and contact details	Group Deputy General Counsel	07/07/2025
2.0	Retired	Group	Final Version	Pennon Board Audit Committee	05/04/2024