

1MCo3 Main Works

Whistleblowing Policy

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Revision	Author	Checked by	Approved by	Date approved	Reason for revision
Co1	Theeba Ragunathan	James Billingham	Isabel Coman	30/05/2018	Internal
Co2	Peter Jones	Elizabeth Tarr – Costain Brigitte Straganz - STRABAG	Eamonn Costello Gerald Zangl Lee Davies	01/10/2020	Annual review
Co3	Theeba Ragunathan	John Westbury/Adrian Chapman – Skanska Alexandra Badel/Robbie Pattie – Costain Martin Begrich/Ghilas Lounis - STRABAG	Approved by the SCS Joint Venture Board at its meeting held on 3 October 2023	12/10/2023	Annual review
Co4	Sarah Pratley	Steve Leven – Skanska Nicole Geoghegan – Costain Sarah Bamunusinghe - STRABAG	Board Members as per main body of the policy	As per main body of the policy	Annual review
Co5	Sarah Pratley	Steve Leven – Skanska Chris Cash – Costain Sarah Bamunusinghe - STRABAG	Board Members as per main body of the policy	29/04/2026	Annual review and updates post Mazars Audit

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Whistleblowing Policy

Skanska Costain STRABAG Joint Venture (SCS JV) is committed to the provision of the highest quality services for, and for full accountability to, HS2, suppliers, partners and SCS JV staff (employed by SCS JV partners). SCS JV recognises that incidents of fraud, mismanagement, or possible wrongdoing, may occur at work irrespective of the controls that have been put in place to prevent them. This Policy sets out what whistleblowing is, SCS JV's responsibilities under legislation (Public Interest Disclosure Act 1998 (PIDA 1998)) covering the protection of whistleblowers, and how all SCS JV staff, partners, and suppliers, can raise any concerns without fear of victimisation, when they believe something is wrong.

This Policy does not set out the procedure that applies to general grievances. A grievance is a formal complaint raised by an employee regarding a problem or concern related to their employment. It can be about various issues, including pay, working conditions, discrimination, harassment, or unfair treatment. If you have a complaint about your own personal circumstances, then you should refer to the SCS Grievance Procedure or your employer's grievance procedure.

This Whistleblowing Policy applies to all SCS JV partners, their officers, directors, and employees, whether permanent or temporary. It also applies to all SCS JV's supply chain partners, including agents, advisers, consultants, and subcontractors (together "Associated Persons"). The aims of this policy are:

- To encourage staff and others to report concerns of suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated thoroughly and in confidence.
- To provide staff and others with guidance on how to raise their concerns.
- To reassure staff and others that they can raise concerns without fear of victimisation.
- All whistleblowing reports will be reviewed (and where possible acknowledged) within two working days of receiving the report. SCS JV's General Counsel is accountable for these investigations. We will aim to complete all investigations and report back to the whistleblower within eight weeks of the whistleblowing report being received.

What is malpractice?

Malpractice throughout this project is defined as things that are 'improper, illegal or negligent', which is not in the public interest. Examples of malpractice include, but are not limited to:

- Criminal offences
- Fraud, theft or other dishonesty, for example wrongfully claiming expenses
- Bribery or corruption
- Misuse of confidential information
- Not disclosing a conflict of interest, gifts and/or hospitality
- Making unauthorised political donations

- Breaching laws (e.g. procurement law, competition law or data protection law)
- Improper accounting or auditing practices
- Breaching ethical policies
- Breaching company policies which may harm HS2 or SCS JV
- Damage to the environment
- Serious breach of health and safety
- Modern slavery
- Concealment of malpractice
- Incidents of racism, and/or sexist remarks or intimidation
- Incidents of bullying

To comply with PIDA 1998 and for the purposes of this Policy, a qualifying disclosure is one which, in the reasonable belief of the reporting staff member, suggests that malpractice has been committed, is being committed, or is likely to be committed. The staff member does not require proof, but a reasonable belief is required.

SCS JV is committed to ensuring that any such malpractice is taken seriously, prevented if it hasn't yet occurred, and immediately dealt with if it should arise. Staff 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 SCS JV, or that they would be subjected to harassment or victimisation. SCS JV encourages all staff to raise concerns. As it is in the best interest of SCS JV, such concerns will be taken seriously and investigated thoroughly and confidentially, and reporting staff will suffer no detriment as a result of raising their concern.

Procedure

SCS JV encourages all staff to raise their concerns about any malpractice at the earliest opportunity using one of the following reporting routes:

- via the confidential reporting line [at EthicsPoint - Skanska Costain STRABAG Joint Venture](#), or;
- confidentially by phone to EthicsPoint on 0800 949 6470;
- by email to ethics@scsrailways.co.uk.

Concerns may also be raised with HS2 directly.

If reported to SCS JV, the SCS JV Ethics & Compliance Officer will ensure that the concern is handled in accordance with relevant policies.

SCS JV staff should note that the key objective of the SCS JV Ethics & Compliance Program is to ensure adherence to the principles set out within this Policy together with the Anti-Bribery Policy, and the SCS Code of Conduct, both of which are available on the SCS JV intranet.

PIDA 1998 states that individuals who make qualifying disclosures of information in the public interest have the right not to be dismissed or suffer detriment by any act or omission of their employer because of that disclosure (in this case, it will extend to SCS JV and SCS JV members). This Policy is compliant with PIDA 1998 and, provided that they follow the steps laid out in this Policy, SCS JV staff and others will be able to raise genuine concerns without suffering any detriment because of that disclosure.

If an SCS JV staff member or others make a qualifying disclosure, which in their reasonable belief is made in the public interest and without malice or a view to personal gain, and SCS JV has reasonable grounds for belief in the individual's concern, SCS JV shall:

- so far as is reasonably practicable, protect the individual's identity and not disclose it at any time, unless necessary for the purposes of investigation or to comply with a legal obligation.
- ensure that the individual is not subjected to any harassment, victimisation, or disciplinary action as a result of raising the concern.
- so far as is reasonably practicable, keep any supporting evidence relating to the concern secure and confidential at all times.

Conclusion

This Policy will be reviewed annually to ensure the management system is suitable, effective, consistently implemented and continually improved to meet the requirements of SCS JV and HS2.

This Policy will be made available and effectively communicated to the SCS JV team.

Any SCS JV staff found to have maliciously raised a report will be in breach of this Policy and may be subject to removal from the project and a referral to their employer parent company.

Approved by the SCS Joint Venture Board

Signed: 
Dave Astbury (May 18, 2026 07:58:48 GMT+1)

Skanska Construction UK Ltd.

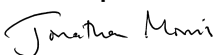
Signed: 

Costain Ltd.

Signed: 
Andrew Dixon (May 14, 2026 09:14:33 GMT+1)

STRABAG AG

Agreed to be implemented by the SCS Joint Venture Project Management Team

Signed: 

Jonathan Morris SCS JV Managing Director