

KME Steelworks Limited

Grievance and Whistleblowing Policy & Procedure

Document Control

- **Policy Owner:** Whistleblowing and Grievance Officer (WGO)
 - **Approved By:** Board of Directors
 - **Effective Date:** 12 September 2025
 - **Next Review Date:** September 2026
 - **Version:** 1.0
-

1. Purpose

This policy outlines the procedures by which employees, contractors, suppliers, and stakeholders may raise grievances or whistleblowing concerns. KME Steelworks Limited is committed to ensuring all complaints are treated fairly, impartially, confidentially, and without risk of retaliation.

2. Scope

This policy applies to:

- All employees of KME Steelworks Limited.
- Contractors, suppliers, consultants, and stakeholders engaged with the company.

Concerns may include (but are not limited to):

- Unlawful or fraudulent activity.
 - Health and safety breaches.
 - Environmental concerns.
 - Breaches of company policy or ethical standards.
 - Workplace bullying, harassment, or discrimination.
-

3. Responsibilities

- The **Whistleblowing and Grievance Officer (WGO)** is responsible for:
 - Administering and overseeing this policy.
 - Ensuring independence and impartiality.
 - Maintaining confidentiality of all parties.

- Reporting directly to the Board of Directors.
 - Line Managers must:
 - Forward any complaints received directly to the WGO without alteration or delay.
-

4. Key Principles

1. **Impartiality & Independence** – All complaints are managed independently of line management.
 2. **Written & Published Rules** – This policy is published and accessible to all staff and stakeholders.
 3. **Acknowledgement** – A written receipt will be issued to the complainant for every reported concern.
 4. **Confidentiality** – Identities of complainants, witnesses, and individuals concerned will remain protected.
 5. **Non-Retaliation** – No employee or stakeholder will face dismissal, disciplinary action, or detriment for raising a complaint in good faith.
 6. **Anonymous Reporting** – Concerns may be submitted via **whistleblowing@kme-steelworks.com**.
 7. **Consultation** – The complainant or their representative will be consulted at all stages.
 8. **Fairness** – All parties will have the opportunity to provide information and respond to findings.
 9. **Right of Appeal** – Any decision may be appealed through the appeals process.
 10. **Annual Review** – This policy will be evaluated annually for effectiveness, independence, and impartiality.
-

5. Reporting Procedure

Concerns may be raised through the following channels:

- Directly to the **Whistleblowing and Grievance Officer (WGO)** in writing, by phone, or in person.
- Via email to **whistleblowing@kme-steelworks.com** (anonymous submissions accepted).
- Through a Line Manager, who must immediately pass the matter to the WGO.

Upon receipt:

- A written acknowledgement will be issued (except where anonymous).
- A case reference number will be assigned.

6. Investigation Process

1. **Initial Review** – WGO assesses the complaint within 5 working days.
2. **Investigation Plan** – An impartial team may be appointed if required.
3. **Consultation** – The complainant (or representative) is consulted and kept informed.
4. **Confidentiality** – Information is shared only on a need-to-know basis.
5. **Outcome** – Findings and proposed remediation are documented and communicated in writing.

7. Remediation & Resolution

- Corrective actions will be implemented promptly if a complaint is upheld.
- Actions may include policy changes, training, disciplinary action, or systemic improvements.
- The complainant will be kept updated throughout the process.

8. Appeals

- Appeals must be submitted in writing to the **Managing Director** within 14 calendar days of the decision.
- An **independent Appeal Panel**, including at least one Board member not previously involved, will review the case.
- The Appeal Panel's decision is final.

9. Annual Evaluation

- The Board of Directors will review this policy annually.
- Evaluation will assess independence, impartiality, effectiveness, and user feedback.
- Updates will be published internally.

10. Policy Commitment

KME Steelworks Limited is committed to a culture of openness, accountability, and integrity. We encourage all employees and stakeholders to raise concerns without fear, knowing that such reports will be taken seriously and addressed appropriately.

11. Sign-Off

A handwritten signature in black ink, appearing to read "J. Owen", written in a cursive style.

Whistleblowing & Grievance Officer:

Date: 12 September 2025