

Introduction

Fitzgerald Contractors, its Directors and Stakeholders are committed to conducting all of our operations to the highest standards of openness, probity and accountability across the following key policy areas:

- Corporate Social Responsibility;
- Ethics & Fraud;
- Diversity;
- Equal Opportunities;
- Health, Safety & Welfare;
- Communities;
- Donations;
- Human Rights;
- Environment; and
- Customer Care.

Policy

This policy applies to all employees and officers of the Company. Other individuals performing functions in relation to the Company, such as agency workers and contractors, are encouraged to use it.

It is important to the business that any suspicion of fraud, misconduct or wrong-doing by workers or officers of the Company is reported and properly dealt with. The Company therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

If an employee is not sure whether to raise a concern, they should discuss the issue with their Line Manager or the Human Resources department. If an employee does not wish to discuss a concern that they have with their Line Manager, they can directly approach a Director.

All concerns raised within the scope of this policy will be investigated by an appointed manager and the findings made available to the Human Resources department and the Managing Director. Any penalties applied will be proportionate to the proven offence, and may result in disciplinary action at all levels.

Fitzgerald reserves the right to take appropriate action against allegations or suspicions that are vexatious and unfounded. Where appropriate, Fitzgerald may inform the informant of progress.

Anonymity

In order to support a thorough investigation, all parties to the process may be called as witnesses. However, we recognise that people in certain cases prefer to report their suspicions anonymously and in these cases anonymity will be recognised by the directors of the company.

The Public Interest Disclosure Act 1998

The legislation gives legal protection to persons providing information relating to the committing of (or the potential to commit) the following:

- Criminal Offences;
- Failure to comply with legal obligations;
- Miscarriages of justice;
- Failure to comply with Health and Safety legislation;
- Environmental Damage; and
- The deliberate concealment of the above.

Approved by N Coley
Managing Director
(January 2026)

