Whistleblowing Policy

Introduction

This policy statement relates to all employees at Energys Group Limited (comprising of Energy Conservation Solutions Ltd, Cube Lighting & Design and Cube Solar Installations Limited).

In support of the Public Interest Disclosure Act 1998 Energys Group encourages all personnel to raise genuine concerns about malpractice at the earliest practicable stage, preserving anonymity of the individuals making the disclosure where requested, or deemed necessary.

Energys Group operates a zero-tolerance culture in relation to fraud. This policy applies to our employees, supply chain, specialist contractors and stakeholders. Legal action will be taken against any individual or company, if it is proven they have acted fraudulently.

Scope

This policy covers concerns related:

- Criminal activity or fraud
- Health and safety risks
- Environmental damage
- Breaches of legal or regulatory obligations
- Misconduct or unethical behaviour
- Attempts to conceal any of the above

Protection and Confidentiality

We are committed to protecting whistleblowers from retaliation, victimization, or disadvantage. All concerns will be treated confidentially and sensitively.

Reporting Procedure

If you have a concern about malpractice the issue should first be raised with your line manager orally or in writing.

If you are unable to raise the matter with your line manager for whatever reason please raise the matter with the HR & Compliance Manager.

If you to prefer to contact an independent third party in confidence:

Whistleblowing: list of prescribed people and bodies - GOV.UK

If these channels have been followed and you still have concerns or if you feel the matter is so serious that you cannot discuss it with any of the above, please contact:

Name: Kevin Cox

Position: Managing Director

Telephone: 01403 786 212

Email: kevin.cox@energysgroup.com

Investigation

Energys Group will investigate all concerns covered by the policy. Any concerns raised will be treated fairly and properly. We will not tolerate the harassment or victimisation of anyone raising a genuine concern.

Deliberate false reporting may result in disciplinary action. Genuine concerns raised in good faith will not result in any penalty.

This policy will be reviewed annually and communicated to all staff.

Independent Channel and Handling of Concerns

In addition to the reporting procedure above and giving effect to the governance commitments in the Energys Group ESG Strategy and Policy Suite, the following arrangements apply to employees, workers and subcontractors of Energys Group.

Commitments

We will:

- Maintain a whistleblowing channel independent of line management, available to employees and subcontractors, including an option to raise concerns anonymously.
- Provide a route to an independent, non-executive party for concerns involving senior management.
- Investigate concerns raised in good faith promptly and confidentially, protecting the identity of the person raising them so far as legally possible.
- Ensure no individual is penalised for raising a concern in good faith, even where the concern proves unfounded.
- Where the internal route is not appropriate, signpost external escalation routes (for example the HSE for safety matters, or the ICO for data protection matters).

Procedures and delivery

Concerns are acknowledged within five working days of being raised, and an outcome or update is provided within 28 days wherever practicable, extended with explanation for complex cases. All concerns and outcomes are logged centrally and reported in summary (anonymised) to the Board.

Monitoring, KPIs and review

We track: number of concerns raised and resolved; average resolution time; and number of substantiated retaliation cases (target zero). Reviewed annually by the Board.



Signed: _____ Date: 1st November 2026

Kevin Cox
Managing Director
On behalf of Energys Group