

WHISTLEBLOWING POLICY



Established in 1897, we are one of the UK's leading family-owned development, building and property maintenance companies. In 2025, we generated £29.2m in statutory profit before tax from a turnover of £2.56bn, working with a wide range of public and private-sector customers and partners. With 6,000 employees and now in our fourth generation of family ownership, we're committed to the long-term sustainability of the built environment and to making our industry more inclusive and representative of the communities we work in. We are an Investors in People Gold-accredited company, driven by our purpose of reimagining places for people to thrive.

Whistleblowing refers to the act of reporting or exposing suspected or actual wrongdoing or danger at work. A whistleblower is the person who reports or raises a concern.

We are committed to creating an environment where people feel safe to raise concerns. We encourage and value openness and honesty and support those who speak out. This enables us to maintain our culture of integrity and:

- Achieve our stated targets and goals
- Ensure we remain the service provider of choice

At Wates, we have set goals and behaviours that expand on our Code of Conduct to help prevent wrongdoing taking place.

In adhering to this policy, we will:

- Create a culture of trust and integrity, which promotes doing the right thing and is supported by our Code of Conduct
- Ensure that anyone that we engage with, whether that is our employees, those in our supply chain, or members of the public, can report concerns they have about the conduct of anyone working for us or on our behalf
- Implement, maintain and continually improve our policies, procedures, rules and guidance to support whistleblowing
- Protect those who raise protected disclosures in accordance with the Public Interest Disclosure Act 1998
- Adopt a zero-tolerance approach to retaliation
- Ensure that where concerns are raised, they are dealt with confidentially and impartially

- Take all concerns reported seriously and in good faith

Anyone can raise a concern by contacting:

- Wates Ethics by email (SpeakUp@wates.co.uk),
- Safecall on (0800 9151571) or
- Online (www.Safecall.co.uk/clients/wates)

Safecall is operated by a third party and calls can be made anonymously and confidentially 24 hours a day, 7 days a week.

Concerns can relate to any inappropriate behaviour or breach of our Code of Conduct by anyone employed by Wates or who is working with or for us.

Concerns should be raised to the whistleblowing line in circumstances where other feedback channels (such as raising issues to a Wates Line Manager or a member of the HR team) are not appropriate, or where the matter is a critical concern, as set out in our Code of Conduct.

Wates employees have a personal responsibility for reporting any critical concerns about bribery or corruption, modern slavery, financial crime (such as money laundering or fraud), competition law breaches or building safety concerns.

Breaches of this policy will be dealt with under Wates Group's disciplinary procedures and could lead to dismissal in appropriate circumstances.

This policy applies to all our employees and those working with us or on our behalf. Successful

implementation requires everyone to cooperate with us to ensure that people are encouraged to raise concerns and feel safe to do so.

The Executive Committee has overall responsibility for ensuring this policy is complied with. It will be reviewed at least once a year and at such other times as may be required, to ensure it remains relevant and appropriate to the aims and objectives of our business.

For and on behalf of the Executive Committee

EOGHAN O'LIONAIRD

A handwritten signature in black ink, appearing to read "Eoghan O'Lionaird".

Chief Executive Officer, June 2026