

Updated to reflect the Employment Rights Act 2025 changes effective from 6 April 2026.

Trident Lifting Solutions



Policy Statement - Trident Lifting Solutions Limited ("Trident", "the Company")

Trident Lifting Solutions Limited is committed to high standards of professional conduct, integrity and accountability. As a specialist lifting and crane solutions provider operating in safety-critical environments, we recognise that the behaviour and standards of our people are fundamental to building a strong, respectful culture and protecting our reputation as a trusted industry leader.

We expect everyone working for or on behalf of the Company to act with professionalism, respect and responsibility at all times, reflecting our values and supporting a positive working environment. Clear standards of behaviour are essential to ensure safety, quality and effective collaboration across our projects and teams.

1. Purpose

Trident is committed to lawful, ethical and transparent business practice. This policy explains how workers can raise genuine concerns about wrongdoing, risk or misconduct in a way that is safe, confidential and taken seriously.

This policy is intended to support disclosures that may amount to whistleblowing under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025. It does not replace other reporting duties required by law or regulation.

2. Scope

This policy applies to all workers engaged by Trident, including employees, directors, officers, agency workers, consultants, contractors, apprentices, home workers, casual workers, volunteers and self-employed individuals working on Trident's behalf.

3. What whistleblowing means

Whistleblowing is the disclosure of information which a worker reasonably believes is in the public interest and tends to show that a relevant wrongdoing has happened, is happening, or is likely to happen.

A whistleblowing concern is different from a personal complaint about an individual's own employment. Personal complaints should usually be raised under the Grievance Policy, Dignity at Work Policy, Anti-Harassment and Bullying Policy, or another relevant internal procedure.

4. Qualifying disclosures

A qualifying disclosure may relate to one or more of the following:

- a criminal offence
- a failure to comply with a legal obligation
- a miscarriage of justice

- a danger to the health or safety of any individual
- sexual harassment, including conduct of a sexual nature that has occurred, is occurring, or is likely to occur
- damage to the environment
- the deliberate concealment of information about any of the above

Concerns may relate to past, current or anticipated wrongdoing. The fact that a concern later proves to be mistaken will not remove protection, provided the disclosure was made with a genuine and reasonable belief and the legal criteria were met.

5. Protection from detriment and dismissal

No worker will be subjected to dismissal, disciplinary action, loss of work, demotion, victimisation, bullying, harassment or any other detriment because they have made, or are believed to have made, a protected disclosure.

Any retaliation against a whistleblower, or against a person assisting an investigation, will be treated as a serious disciplinary matter.

Protection does not extend to disclosures that are knowingly false, deliberately misleading or made maliciously. Deliberate misuse of this policy may result in disciplinary action.

6. How to raise a concern

A concern should normally be raised as soon as possible with one of the following:

- the worker's line manager
- a more senior manager, where the concern relates to the line manager or it would not be appropriate to report to them
- the HR Department
- a Trident director, where the concern is particularly serious or sensitive

Concerns may be raised verbally or in writing. Where a concern is raised verbally, Trident may ask the individual to confirm the key points in writing, or may prepare a written note and ask the individual to confirm that it is accurate.

To help an investigation, the worker should provide as much factual information as possible, including:

- what happened, or what is believed may happen
- when and where the issue arose
- who may be involved
- whether there are any documents, messages, photographs or other supporting evidence
- whether anyone else may have witnessed or been affected by the issue

7. Confidentiality and anonymous reports

Trident will treat whistleblowing concerns as confidential so far as reasonably possible. Information will only be shared with those who need it to investigate, manage risk, take action or comply with the law.

Workers may raise concerns anonymously. Anonymous reports will be considered, but an investigation may be more limited where it is not possible to clarify the concern or test the evidence with the reporting individual.

8. How Trident will respond

Trident will assess each concern promptly and decide the most appropriate next step. This may include an internal investigation, referral to another internal process, or referral to an external regulator, auditor, adviser or enforcement body.

Where appropriate, Trident will arrange an initial meeting to understand the concern, the available evidence and any immediate welfare or safeguarding issues.

The investigating manager will aim to handle the matter without unreasonable delay. Timeframes may vary depending on the seriousness, complexity and evidence involved.

The whistleblower will normally receive feedback on the outcome or status of the matter, subject to legal obligations, confidentiality and the rights of other individuals.

9. External disclosures

Trident encourages workers to raise concerns internally first where this is appropriate and safe to do so. However, nothing in this policy prevents a worker from making a protected disclosure to a prescribed regulator or other appropriate external body where the legal requirements are satisfied.

Workers considering an external disclosure should take care to avoid unlawful disclosure of confidential, personal, legally privileged or commercially sensitive information except where the law permits it.

10. Relationship with other policies

Depending on the nature of the issue, Trident may deal with a concern under another procedure where that is more appropriate. This may include the Grievance Policy, Disciplinary Policy, Anti-Harassment and Bullying Policy, Equality Policy, Health and Safety Policy or Safeguarding procedures. Trident may still treat parts of the matter as whistleblowing where that is justified.

11. Policy responsibility and review

The HR Department owns this policy and is responsible for keeping it under review. Managers must ensure that workers know how to raise concerns and that any concern raised under this policy is escalated promptly and handled appropriately.

This policy will be reviewed regularly and updated to reflect changes in law, regulation and Trident practice.

For questions about this policy, workers should contact the HR Department.

AUTHORISED AND SIGNED

SIGNED



Chris Conway
Director

Review: **Annually**
Date: **28/08/2026**
Next Review: **28/08/2027**

SIGNED



Martina Oyite
Chief People Officer

Review: **Annually**
Date: **28/08/2026**
Next Review: **28/08/2027**