SPEAK UP & WHISTLEBLOWING POLICY

Controlled company policy | MOG-POL-WB-001 | Revision 0 | 18 October 2026

1. Policy statement

Mogas Design Ltd encourages its directors, independent contractors, suppliers and other people working with the company to speak up promptly about suspected wrongdoing, unethical conduct, safety failures or harm. Concerns will be taken seriously, handled fairly and investigated proportionately. Victimisation for raising a genuine concern is prohibited.

2. Scope and legal distinction

This is a company reporting route open to everyone connected with Mogas, including independent contractors and client-site visitors. Legal protection for whistleblowing under the Employment Rights Act 1996 and Public Interest Disclosure Act 1998 depends on the individual qualifying as a worker, making a qualifying disclosure in the public interest and using an appropriate reporting channel; a company policy cannot guarantee statutory protection for every supplier or company director.

3. What to report

Concerns include bribery, corruption, fraud, money laundering, false invoices or engineering records; conflicts of interest; breaches of law or site rules; unsafe gas-asset activities, hazards and near misses; environmental damage; modern slavery and human rights abuse; discrimination, harassment or sexual harassment; concealment of wrongdoing; and misuse of confidential data or client information.

4. Speak-up channels

Raise a concern directly with either Mogas director, verbally or in writing, with the facts, dates, persons involved and available evidence. If one director is implicated, contact the other. If both are implicated, or internal reporting is not safe or appropriate, contact the relevant client reporting channel, regulator/prescribed person, police or an independent adviser as appropriate. No invented anonymous hotline or dedicated compliance team is represented in this policy.

5. Urgent hazards and emergencies

In immediate danger, stop work where safe, move to safety and call 999 when necessary. At client-controlled gas sites notify the site controller and follow the site emergency plan. Do not operate gas equipment without authorisation. An emergency notification is separate from, and takes precedence over, ordinary whistleblowing case administration. Use the accident, near-miss or environmental incident forms for operational recording.

6. Confidentiality and anonymity

Share information only with people who need it for assessment, investigation, safety or legal compliance. Anonymous reports are accepted where practicable but may limit the ability to investigate or provide feedback. Absolute confidentiality cannot be promised: disclosures may be required for a fair investigation, safeguarding or legal duties. Personal information must be held securely and retained no longer than necessary under applicable policy and law.

7. Receipt, assessment and investigation

The receiving director should log the concern securely, assess immediate risks and conflicts of interest, acknowledge it where contact details exist, appoint an impartial reviewer where practicable, preserve evidence, hear relevant parties fairly, document findings and agree proportionate corrective actions. Where the matter concerns a director or serious criminal wrongdoing, consider independent investigation or external referral. Timeframes depend on urgency and complexity; provide reasonable updates without promising a fixed outcome.

8. Protection from retaliation

Mogas will not tolerate dismissal, withholding of contracts, threats, harassment, intimidation or other retaliation for raising a concern honestly. A concern need not be proven for the reporter to be treated fairly. Knowingly fabricated malicious allegations may be handled separately following a fair assessment; mistaken but honestly held concerns will not be punished.

9. External disclosures and advice

A person may seek confidential advice or report matters to the relevant prescribed regulator where the legal conditions are met; examples may include HSE for health and safety, the Environment Agency for relevant pollution issues and HMRC for tax wrongdoing. Which regulator is appropriate depends on the concern. Legal protection for wider public disclosures is narrower. Nothing in this policy prevents lawful protected disclosures or seeking legal advice.

10. Personal grievances and related policies

Individual matters such as contractual disagreements may use the relevant contract or grievance process, unless the information also meets the public-interest whistleblowing criteria. Refer to the Anti-Bribery, Corruption and Fraud Policy; Modern Slavery and Human Rights Policy; Accident and Near-Miss Reporting Policy; Environmental Incident Reporting Policy; and Gas Site Visiting Safety and Conduct Policy.

11. Records, oversight and annual review

Keep a restricted speak-up log recording case ID, date, type of concern, immediate safeguards, assigned reviewer, investigation status, action owner and closure/effectiveness check without unnecessary personal details. Directors review anonymised trends annually and revise this policy after significant incidents, legal change or material business changes.

Document control and director approval

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Director	Mohammed Fasiuddin
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Director signature:

Signed copy held on file – available on request.