



P O L I C Y 1 1 O F 1 6

Whistleblowing Policy

Real partnership. Real expertise.

Document reference	SOMA-POL-11
Version	2.0
Issue date	March 2026
Next review	March 2027
Policy owner	Adam O'Neill, Director
Approved by	Stevie MacGregor
Classification	Public — available on request

SOMA Project Controls Ltdwww.somaprojectcontrols.com

1. Purpose

This policy gives everyone at SOMA Project Controls Ltd — and those working with us — a clear, safe route to raise serious concerns about wrongdoing, and sets out how those concerns will be handled.

2. Scope

Applies to employees, directors, associates, contractors, agency workers, volunteers and workers of our suppliers. Concerns raised by clients or members of the public are also welcomed and are handled through this process.

3. What This Policy Covers

This policy covers concerns about serious wrongdoing in the public interest, including:

- Criminal activity, including bribery, fraud and theft.
- Modern slavery or human-rights abuses in our operations or supply chain.
- Breach of legal or regulatory obligations.
- Danger to the health and safety of any individual.
- Damage to the environment.
- Deliberate concealment of any of the above.

4. Legal Protection

In the UK, workers raising a qualifying concern in good faith are protected by the Public Interest Disclosure Act 1998. SOMA will not tolerate any form of retaliation against a person raising a concern, and any such retaliation is a serious disciplinary matter.

5. How to Raise a Concern

1. Speak to your line manager or, if that is not appropriate, to the Director.
2. If neither is appropriate, email whistleblowing@somaprojectcontrols.com — this inbox is monitored only by the Director.
3. If the concern involves the Director, it may be raised with the company's external accountant or legal adviser.
4. Concerns may be raised anonymously, though we ask for identifying details where possible so the matter can be investigated thoroughly.

6. What Happens Next

- Concerns are acknowledged within five working days.
- An initial assessment determines whether this policy applies and how the matter will be investigated.
- The person raising the concern is kept informed of progress as far as confidentiality allows.
- Investigations are carried out proportionately, fairly, and with external support where needed.
- Outcomes and any actions taken are fed back to the person raising the concern.

7. Confidentiality & External Disclosure

Concerns are treated in confidence. Identities are shared only with those who need to know in order to investigate the matter properly. In some cases, the law or the seriousness of the matter may require external disclosure — for example to a regulator or to law enforcement — and we will do so where required. Prescribed external bodies are listed on gov.uk.

8. Bad-Faith Disclosures

A person raising a concern in good faith is protected even if the concern turns out to be mistaken. However, deliberately false, malicious or vexatious disclosures are themselves a serious disciplinary matter.

9. Review & Governance

This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

S I G N E D & A P P R O V E D

Policy Adoption & Approval

This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.

P O L I C Y O W N E R*Adam O'Neill***Adam O'Neill**Director
SOMA Project Controls Ltd**Date: March 2026****A P P R O V E D B Y***Stevie MacGregor***Stevie MacGregor**Director
SOMA Project Controls Ltd**Date: March 2026****N e x t s c h e d u l e d r e v i e w****March 2027**