

Whistleblowing Policy

Capital Sky Ltd is committed to conducting its business with honesty, integrity, accountability, and transparency and to maintaining the highest standards of ethical, professional, and legal conduct throughout all company activities.

This Policy supports a positive reporting culture where employees and individuals working on behalf of Capital Sky Ltd feel able to raise genuine concerns regarding suspected wrongdoing, unsafe practices, unethical behaviour, or breaches of legal or regulatory obligations without fear of retaliation, victimisation, or disadvantage.

This Policy is implemented in accordance with the principles of the [Public Interest Disclosure Act 1998 \(PIDA\)](#) and supports the organisation's wider commitments under its Integrated Management System, including compliance with ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018.

Capital Sky Ltd recognises the importance of openness, accountability, competence, and effective reporting arrangements in support of the [Building Safety Act 2022](#), [Building Regulations](#), health and safety legislation, environmental responsibilities, and wider construction industry best practice.

This Policy applies to all employees, agency workers, subcontractors, consultants, suppliers, trainees, temporary workers, and any other persons working for or on behalf of Capital Sky Ltd, regardless of position, seniority, or location.

Purpose

The purpose of this Policy is to:

- Encourage individuals to report genuine concerns at the earliest opportunity.
- Ensure concerns are taken seriously, investigated appropriately, and handled confidentially where reasonably practicable.
- Provide protection for individuals making disclosures in good faith.
- Promote a culture of ethical behaviour, legal compliance, transparency, and continual improvement.
- Support effective governance, risk management, health and safety, environmental protection, and responsible business conduct.

Reportable Concerns

Concerns may relate to any matter which an individual reasonably believes is in the public interest, including but not limited to:

- Criminal offences, fraud, bribery, corruption, or financial malpractice.
- Breaches of legal obligations, statutory duties, or regulatory requirements.
- Unsafe working practices or dangers to health, safety, wellbeing, or the environment.
- Breaches of the [Building Safety Act 2022](#) or [Building Regulations](#).
- Unsafe construction activities, defective works, or failures relating to safety-critical systems or products.
- Modern slavery, discrimination, harassment, bullying, or unethical conduct.
- Deliberate concealment of information relating to any of the above.

- Serious breaches of company procedures, management systems, or professional standards.

This Policy is not intended to replace normal management procedures for dealing with routine employment matters, grievances, or disciplinary issues unless these involve wider public interest concerns.

Confidentiality and Protection

Capital Sky Ltd will treat all disclosures seriously, sensitively, and confidentially. Every reasonable effort will be made to protect the identity of individuals raising concerns, provided this does not prevent a fair and thorough investigation or breach legal obligations.

Individuals making disclosures in good faith will be protected from dismissal, disciplinary action, victimisation, harassment, threats, discrimination, or any other detrimental treatment as a result of raising a concern.

Any act of retaliation against a whistleblower will be treated as a serious disciplinary matter.

Concerns may be raised anonymously; however, individuals are encouraged to provide their identity where possible to assist investigation, communication, and evidence gathering. Anonymous disclosures will still be considered, taking into account the seriousness, credibility, and available evidence relating to the concern raised.

Malicious, knowingly false, or vexatious allegations may result in disciplinary action.

How and Where to Raise Concerns

Concerns should be raised at the earliest opportunity to enable prompt investigation and risk mitigation.

Employees should normally raise concerns with their immediate supervisor or line manager.

If this is not appropriate, concerns may be raised through the following internal channels:

- Project Manager or Contracts Manager
- Senior Management or Company Directors
- Confidential reporting via: admin@capitalsky.uk

Where provided, concerns may also be raised anonymously through internal reporting systems.

If an individual feels unable to raise a concern internally, or believes it has not been appropriately addressed, they may escalate externally to the following prescribed bodies and organisations:

- [Health and Safety Executive \(HSE\)](#)
- [Environment Agency](#)
- Local Authority Building Control or Building Safety Regulator
- Police or relevant enforcement authorities
- Advisory, Conciliation and Arbitration Service (ACAS): 0300 123 1100 – www.acas.org.uk
- Whistleblowing Charity Protect: 020 3117 2520 – www.protect-advice.org.uk

Concerns will be treated confidentially wherever reasonably practicable, and disclosures will be assessed and acted upon appropriately.

Investigation Process

All concerns raised under this Policy will be assessed appropriately and investigated proportionately depending on the nature, seriousness, and potential risks associated with the matter raised.

Investigations may involve internal management, external advisors, auditors, regulatory authorities, or enforcement agencies where appropriate.

Capital Sky Ltd will seek to keep the individual informed regarding the progress and outcome of investigations where reasonably practicable and legally permissible.

Appropriate corrective actions, disciplinary measures, management controls, or improvement actions will be implemented where concerns are substantiated.

Responsibilities

All employees and persons working on behalf of Capital Sky Ltd are responsible for:

- Acting honestly, ethically, and professionally.
- Raising concerns where wrongdoing, unsafe practices, or unethical conduct are identified or suspected.
- Cooperating fully with investigations where required.
- Maintaining confidentiality regarding investigations and associated information.

Managers are responsible for:

- Promoting a culture where concerns can be raised openly and without fear.
- Ensuring concerns are treated seriously and escalated appropriately.
- Supporting confidentiality and protection arrangements.
- Ensuring no retaliatory behaviour occurs.
- Supporting continual improvement of reporting, governance, and compliance arrangements.

Monitoring and Review

Capital Sky Ltd will monitor the effectiveness and implementation of this Policy through management review, audits, investigations, reporting trends, and continual improvement processes.

This Policy will be reviewed at regular intervals and at least annually, or sooner where required due to changes in legislation, organisational activities, regulatory requirements, or industry best practice.

This Policy does not form part of any employee's contract of employment and may be amended at any time.

Name: Martin Maloney

Position: Chief Executive Officer

Signature:



Dated: 15/05/2026

Latest Review Date: 15/05/2027