

WHISTLEBLOWING

1. Overview

- 1.1. This policy outlines what you should do if you suspect something happening at work is putting you or others in danger, or is illegal or unethical.
- 1.2. It applies to all employees, contractors, consultants, officers, interns, casual and agency workers. It does not form part of your contract of employment and can be amended at any time.
- 1.3. If you are an employee, this policy does not form part of your contract of employment.

2. What is whistleblowing?

- 2.1. Our aim is to maintain the highest standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. If you have such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’. You can be assured that we will take your concerns seriously, that they will be thoroughly investigated, and that you can be confident there will be no reprisals.
- 2.2. The types of concerns you may want to raise with us by whistleblowing include:
 - any activity you suspect is criminal
 - any activity you suspect puts health and safety at risk
 - any activity you suspect may damage the environment
 - any activity you suspect breaches our policy on bribery and corruption
 - any failure to comply with legal or regulatory obligations
 - any failure to meet professional requirements
 - any attempt to conceal one or more of these activities.
- 2.3. Speak to your manager or a director if you are not sure whether something you have become aware of is covered by this policy.
- 2.4. Please note that if your complaint is about the way people are behaving towards you, then you should refer to our policy on Bullying and Harassment, or to our Grievance Policy, for guidance on how to proceed.

3. How to raise a whistleblowing concern

- 3.1. In most cases, you should start by raising your concerns with either your manager. You can do this in writing or by requesting a confidential one to one meeting.
- 3.2. If you would prefer not to go to your manager, or your manager fails to address all your concerns, you should write to one of the Company’s directors. You should also do this if your concerns are of a very serious nature.

- 3.3. Your letter should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.
- 3.4. You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.
- 3.5. After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.
- 3.6. You will be kept informed about how our investigations are progressing and how long they are likely to take. Sometimes, however, we may be unable to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating and give you concerns about whether we have actually done anything, and if this happens we will do our best to explain why we are acting in the way we are.
- 3.7. Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of the directors for further consideration.
- 3.8. Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our disciplinary policy and may be dismissed for misconduct, or even gross misconduct.

4. Confidentiality and anonymity

- 4.1. There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We discourage anonymous whistleblowing.
- 4.2. You are always encouraged to raise concerns openly, and if you prefer to do so in confidence we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.
- 4.3. You are protected from reprisals under this policy (see paragraph 5), but if you are still worried we encourage you to discuss this with us and we will explore how far we can go in keeping your concerns confidential.
- 4.4. Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether your allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

5. How we protect whistleblowers

- 5.1. If you raise a concern in good faith under this policy, we will support you even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation, etc. However, if you feel you have been treated detrimentally as a result of raising a concern, you must tell us at once. First inform your manager and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.
- 5.2. All whistleblowers are afforded the same protection, so you must not threaten others who have raised concerns. You may face disciplinary action, which could include dismissal for gross misconduct, if we find that you have. You may also face legal action from the whistleblower in these circumstances.
- 5.3. You can seek further advice on whistleblowing, protecting confidentiality, and being protected from reprisals from the independent charity Public Concern at Work, which offers a confidential helpline on 020 7404 6609; www.pcaw.org.uk.

6. Taking your concerns outside the Company

- 6.1. This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the Company to become involved when a whistleblowing allegation is made.
- 6.2. In some exceptional circumstances, you may need to go to an external body (e.g. an industry regulator) and the independent charity Public Concern at Work (contact details in paragraph 5.3) can direct you towards the appropriate regulator for the type of issue you want to raise.
- 6.3. This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your manager or a director will be able to explain how you should proceed.
- 6.4. Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate. We strongly discourage you from doing so, and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or ‘Public Concern At Work’ before being justified in approaching the press.