

Whistle Blowing Policy & Procedure

1. Statement

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within the organisation and alerts the employer or the relevant authority accordingly.

We are committed to always conducting business with honesty and integrity.

If this commitment is not respected or appears to be in question we will endeavor to identify and remedy such situations. If a person has reasonable grounds to believe an employee, manager or any other person related to the organization has committed or is about to commit an offence or action that could harm our business we will formally address the wrong doer.

2. Purpose

The purpose of this policy is to encourage current and former employees, contractual third parties or partners to communicate events that raise serious concerns about the organisation. We encourage and will support all staff who report illegal practices or individuals who violate our policies.

3. Responsibility

This policy applies to all employees, contractual third parties or partners doing business with us.

4. Duty to Report

You are forbidden from disclosing or making use of confidential information in any form whatsoever. However, the Public Interest Disclosure Act 1998 allows you to make a 'protected disclosure' of certain information. To be 'protected' a disclosure must relate to a specific subject matter which are listed below. The disclosure must also be made in an appropriate way.

If you become aware of information which you reasonably believe tends to show one or more of the following, you must use our disclosure procedure set out below:

- That a criminal offence has been committed, is being committed or is likely to be committed.
- That a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject.
- That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- That the health or safety of any individual has been, is being, or is likely to be, endangered.
- That the environment, has been, is being, or is likely to be, damaged.
- That information tending to show any of the above, is being or is likely to be deliberately concealed.

Whistle Blowing Policy & Procedure

5. Disclosure Procedure

Information which you reasonably believes tends to show one or more of the above should be disclosed to a Manager immediately so that any appropriate action can be taken. If it is not appropriate to make a disclosure to the manager then you should speak to a Director or Senior Manager.

5.1 Action to be Taken by the Manager

Any manager who is informed by an individual of potential wrongdoing will take immediate action to investigate the situation. The manager will take every possible step to maintain your anonymity as the individual making an allegation of wrongdoing.

You will be kept informed of any investigation that is taking place. You will also be informed of the outcome of the investigation. It might not be appropriate to tell you the details of any action that is taken. However you will be informed if action is taken.

5.2 Alerting Outside Bodies to a Potential Wrongdoing

Initially you should talk to a manager in the organisation about a potential wrongdoing. If you are not satisfied with the response then you may contact a relevant external body to express the concerns. You should:

- Have a reasonable belief that the allegation is based on correct facts
- Make the disclosure to a relevant body
- Have a reasonable belief it is in the public interest to make the disclosure.

A “relevant body” is likely to be a regulatory body (e.g. the Health and Safety Executive or the Financial Conduct Authority).

6. Contacting the Media

The media is not a relevant external body.

You should not contact the media with allegations about the organisation.

7. Protection Against Detriment

If you take action under the Public Interest Disclosure Act 1998 you will be protected from suffering a detriment for raising allegations. This includes protection from victimisation by the organisation or by colleagues.

If you do not follow our procedure encompassing the requirements of the Public Disclosure Act 1998 then protection against detriment will not apply. Disclosing information in an inappropriate way (e.g. contacting the media) could result in disciplinary action being taken. This could include dismissal.

For further guidance in relation to this matter or concerning the use of the disclosure procedure you should speak in confidence to a Director or Senior Manager.

Whistle Blowing Policy & Procedure

Policy Issue Date	Director Signature
11 th April 2025	