

Whistleblowing

Definition

Telling someone in authority about something illegal that is happening, especially in a government department or a company

Statement

The Public Interest Disclosure Act 1998 (the “Act”) provides protection for employees that report certain acts and omissions that relate to the Company and its operations.

The Company and its employees are bound by national laws and regulations and must abide by these at all times. The Company supports the right of employees acting in good faith to report instances where they feel a matter of public interest is not being or has not been properly dealt with. In any such case the Company will promptly investigate all the circumstances of the case and take the proper action following a decision on the matter.

The Policy provides employees with guidance as to the circumstances under which such protection is available and the steps to be taken should they feel that breaches of obligations have occurred that are of public concern.

Disclosure can be made to certain individuals and authorities that are defined by law, however, the conditions under which this may be done in order for the employee to gain full protection under the Act are limited.

Policy

It is a requirement of the Company that any disclosures of this nature are initially made to the Company.

1. Public Interest Disclosures

1.1 The law refers to disclosures to which the Act applies as “qualifying disclosures”. In order for a disclosure by an employee of the Company to fall under the Act the employee should show a reasonable belief that the disclosure tends to show one or more of the following:

- breach of a legal obligation
- a criminal offence
- a miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment

that information of the type set out above has been or is likely to be deliberately concealed.

2. Company Procedure

2.1 Should an employee be concerned about circumstances that it is felt may need action by the Company or its employees this should be raised immediately with the Immediate Manager.

2.2 If the employee is unhappy with the steps taken by his or her Immediate Manager or with any explanation given this concern should promptly be raised with a senior manager.

2.3 As far as is possible the Company will ensure that any disclosure by an employee is kept confidential. Employees should be aware that it may be necessary to divulge such information during the course of any

investigation. If an investigation into the allegations is thought necessary, the employee will be informed that the allegations will be put to the person accused of wrongdoing.

2.4 The employee will be informed by the Company of the progress and outcome of any investigation into the allegations and the employee should raise the matter with the Company's senior management if it is felt that adequate information is not being provided within a reasonable timescale.

2.5 In the event that the disclosing employee is unhappy with the responses received from the Company to enquiries concerning an investigation, or with the way the investigation is being carried out, senior management in the Company should be contacted immediately.

2.6 Should the employee still be dissatisfied after contacting senior management, or is dissatisfied with the outcome of the investigation this should immediately be reported to a Director of the company.

2.7 Employees that properly make a disclosure under the Act are protected from detrimental treatment including dismissal due to having made the disclosure. However, disclosures under the Act must be made in good faith and not be motivated by any other improper reason (such as malice). Disclosures that are made with improper motives may constitute disciplinary offences.

Signed:



Position:

Managing Director

Date:

November 2022