

Whistleblowing - Policy Statement

This Company encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations.

In particular, the Company recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation 's success ensured.

This policy is designed to provide guidance to all those who work with or within the Company who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

Procedure

This policy will apply in cases where employees genuinely and in good faith believe that one of the following sets of circumstances is occurring, has occurred or may occur within the Company that:

- 1 a criminal offence has been committed, is being committed or is likely to be committed
- 2 a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- 3 a miscarriage of justice has occurred, is occurring or is likely to occur
- 4 the health and safety of any individual has been, is being or is likely to be endangered
- 5 the environment has been, is being or is likely to be damaged
- 6 information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

It is not necessary that employees prove the breach or failure that they are alleging has occurred or is likely to occur but may simply raise a reasonable suspicion. However, they should note that they will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence or if they make the disclosure motivated by a reason which is not in good faith.

- 1 If employees wish to raise or discuss any issues which might fall into the above category they should contact the Personnel Manager or, in his or her absence or in any other circumstances their Contracts Manager, who will treat the matter in confidence. In such cases it is likely that further investigation will be necessary and employees may be required to attend a disciplinary or investigative hearing as a witness. Appropriate steps will be taken to ensure that their working environment and/or working relationship is/are not prejudiced by the fact of

the disclosure.

- 2 If employees reasonably believe that the relevant failure (ie one of the set of circumstances listed above relates wholly or mainly to the conduct of a person other than their employer or any other matter for which a person other than the organisation has legal responsibility, then they should make that disclosure to that other person.
- 3 Also, employees may make such a disclosure to Public Concern at Work, the leading authority on public interest whistleblowing, if they consider that it has an interest in the matter and, despite the best efforts of the Company, employees believe that disclosure within the Company is inappropriate or has been unsuccessful. Disclosures made to employees' legal advisors in the course of obtaining legal advice will be protected.
- 4 Employees should be aware that the policy will apply where a disclosure is made in good faith and where they reasonably believe that the information disclosed and any allegation contained in it are substantially true. If any disclosure is made in bad faith (for instance, in order to cause disruption within the organization), or concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the Company's Disciplinary Policy and Procedures and may constitute gross misconduct for which summary dismissal is the sanction.
- 5 While the Company hopes that such disclosures will never be necessary within its organisation, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.

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