

Whistleblowing Policy

1. About this Policy

- 1.1. We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. Therefore, any suspected wrongdoing should be reported as soon as possible.
- 1.2. This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.
- 1.3. This policy does not form part of any employee's employment contract, and we may amend it at any time.

2. What Is Whistleblowing?

- 2.1. Whistleblowing is reporting suspected wrongdoing or dangers related to our activities. This includes but is not limited to bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, and any breach of legal or professional obligations.

3. How to Raise a Concern

- 3.1. We hope that, in many cases, you will be able to raise any concerns with your manager. However, if you prefer not to raise it with your manager for any reason, you should contact the [Whistleblowing Officer (the Chief Executive) or a member of the Senior Management Team]. Contact details are at the end of this policy.
- 3.2. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4. Confidentiality

- 4.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are challenging to investigate. If you want to raise your concern confidentially, we will make every effort to keep

your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. External Disclosures

- 5.1. This policy aims to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.
- 5.2. In some circumstances, the law recognizes that it may be appropriate for you to report your concerns to an external body, such as a regulator, in some circumstances. However, we strongly encourage you to seek advice before reporting a concern to anyone external. **The company operates a confidential helpline. Their contact details are at the end of this policy.**

6. Protection and Support for Whistleblowers

- 6.1. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2. Whistleblowers must not suffer any detrimental treatment due to raising a genuine concern. If you believe you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 6.3. It is the Company's policy that the Company, its employees, and agents shall not threaten or retaliate against whistleblowers in any way. You may be subject to disciplinary action if you are involved in such conduct. In addition, in some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 6.4. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

7. Whistleblowing Contacts

- 7.1. **[WHISTLEBLOWING OFFICER, INDEPENDENT 3RD PARTY IF NEEDED]**