



BEING REGULATED

21 WHISTLEBLOWING POLICY

1. OVERVIEW

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

2 WHAT IS WHISTLEBLOWING?

- 2.1 We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law, or that breaches ethical or professional codes. If you have any such concerns, we encourage you to report them immediately, this is called 'whistleblowing'. We will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.
- 2.2 The types of concerns you may want to raise with us by whistleblowing might include:
 - 2.2.1 any activity you suspect is criminal (facilitating tax evasion, for example);
 - 2.2.2 any activity you suspect puts health and safety at risk;
 - 2.2.3 any activity you suspect may damage the environment;
 - 2.2.4 any activity you suspect breaches our Bribery policy;
 - 2.2.5 any failure to comply with legal or regulatory obligations;
 - 2.2.6 any failure to meet professional requirements; and/or
 - 2.2.7 any attempt to conceal one or more of these activities.
- 2.3 Speak to your manager if you are not sure whether something you have become aware of is covered by this policy. 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 your manager, either face-to-face or in writing.
- 3.2 If you would prefer not to go to your manager, 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 those concerns 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 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 We will keep you informed in general terms about how our investigation is progressing and how long it likely to take. We may not be able 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 so we will do our best to reassure you that things are in hand and 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 our board directors for further consideration.
- 3.8 Most concerns are raised with good intentions, 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 is at risk of being dismissed for 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 actively discourage anonymous whistleblowing. Concerns raised anonymously are very difficult and sometimes impossible to investigate. We can't properly establish whether 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.
- 4.2 If you do not feel comfortable in reporting your concern openly, tell us and we will do all we can protect your identity. We may want to disclose your identity to people involved in the investigation, but we 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, talk to us. We will explore how far we can go in keeping your concerns confidential.

5 HOW WE PROTECT WHISTLEBLOWERS

- 5.1 If you raise a genuine concern under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation or other activity set out in paragraph 2.2 above. However, if you feel you have been treated badly as a result of raising a concern, you must tell us straightaway. 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 given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. If you do, you may face disciplinary action which could include dismissal for gross misconduct. The whistleblower may also be able to bring legal action against you.
- 5.3 You can get further advice on whistleblowing, protecting confidentiality, and being protected from reprisals at: www.protect-advice.org.uk. Protect is an independent charity that also offers an advice telephone line.

6 TAKING YOUR CONCERN 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 — an industry regulator, for example.



- 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 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 in any situation. 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 from Protect before being justified in approaching the press.