



# WHISTLE BLOWING POLICY

re-approved on 20 January 2016

This document outlines the Company's policy on encouraging staff to report any malpractice, illegal acts or omissions by current or previous employees. The policy also covers the protection afforded to employees who do report such activities.

## 1 Policy

- 1.1 The Group is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its practices.
- 1.2 To achieve these ends it encourages employees to use internal mechanisms for reporting any malpractice or illegal acts or omissions by its employees or ex-employees.
- 1.3 The procedure below provides guidelines for any employee who feels they need to raise concerns relating to the Company in confidence.
- 1.4 The Public Interest Disclosure Act 1998 (commonly known as the "Whistleblowing Act") came into effect on 1<sup>st</sup> July 1999. This Act sets out the framework to promote the responsible and protected disclosure of concerns on the following matters:
  - 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 a legal obligations which they are subject to;
  - Suspected fraud;
  - that the health and safety of an individual has been, is being or is likely to be endangered;
  - that the environment has been, is being or is likely to be damaged;
  - a breach of code of conduct
  - showing undue favour over a contractual matter;
  - information on any of the above has been, is being or is likely to be concealed.
- 1.5 The procedure allows individuals to have their concerns treated in confidence.
- 1.6 All concerns must be raised in good faith. Anyone who abuses the procedure (for



example by maliciously raising a concern they know to be untrue) will be subject to disciplinary action, as will anyone who victimises a colleague by raising a concern through this procedure.

- 1.7 The Board is committed to the policy. If you raise a genuine concern, you will not be at risk of damaging your position as a result provided you acted in good faith.
- 1.8 The Group will not tolerate the victimisation of anyone raising a genuine concern and anybody responsible will be subject to disciplinary action.

## **2 Procedure**

- 2.1 The following people have been nominated and agreed by the Group as designated officers for concerns under this procedure:
  - Group Finance Director
  - Company Secretary

They will have direct access to the Chairman of the Group.

- 2.2 The employee should advise a Designated Officer of their concerns either face to face or in writing. You should make it clear that you are raising a concern under our whistleblowing procedure.
- 2.3 The Designated Officers will arrange an initial interview to assess the areas of concern. At this stage the whistleblower will be asked if he/she wishes his/her identity to be disclosed and will be reassured about protection from possible reprisals. He/she will be asked whether or not he/she wishes to make a written or verbal statement. In either case the designated officer will write a brief summary of the interview which will be agreed by both parties.

You may be accompanied at the interview by a fellow employee of your choice.

- 2.4 The Designated Officer will report to the Chairman who will be responsible for the commission of any further investigation.
- 2.5 The Chairman will brief the Designated Officer as to the outcome of the investigation who will in turn arrange a meeting with the whistleblower to give feedback on any actions taken.