



WHISTLEBLOWING POLICY STATEMENT

The Company seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organisation, we believe that we can help prevent such situations occurring. We expect all staff to maintain high standards and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of all workers to raise any concerns that they might have about malpractice within the workplace. The aim of this policy is to ensure that our workers are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

The following guidance sets out the procedure by which staff can report concerns about workplace practices. This policy has been developed using guidance produced by various bodies including the independent charity Public Concern at Work and the Institute of Chartered Accounts in England and Wales.

This policy is for guidance only and does not form part of your contract of employment.

Legislative Framework

Whistle-blowing is the disclosure of information by an employee or worker which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or unfairly dismissed as a result.

Personnel Responsible For Implementation of Policy

The board has overall responsibility for the Company's policy on whistle-blowing, but has delegated day-to-day responsibility for overseeing and implementing it to the designated whistle-blowing officer (DWO), Emma Sullivan. Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the organisation resulting from investigations into complaints under the policy lies with the board.

Managers have a specific responsibility to facilitate the operation of this policy and

to ensure that workers feel able to raise concerns without fear of reprisals in accordance with the procedure set down below. To facilitate this process, managers will be given training on the relevant legal and operational framework and best practice.

All workers are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware. If you have any questions about the content or application of this policy, you should contact the DWO to request training.

Who is covered by the policy?

This policy applies to all individuals working for us at all levels and grades, whether they are senior managers, directors, employees, contractors, trainees, home-workers or agency staff (collectively known as “workers” in this policy).

Whistle-blowing procedure

Further details about the Whistle-blowing procedure can be found in the Company Employee Manual. This is available on the Company intranet or in the HR department.

Monitoring and Review of Policy

This policy reflects the law and the Company's practice. The DWO, in conjunction with the board will be responsible for reviewing this policy from a legislative and operational perspective.

The DWO has responsibility for ensuring that any personnel who may be involved with administration or investigations carried out under this policy receive regular and appropriate training to assist them with these duties.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the DWO.

Signed



Position CEO

Date: 18 September 2023