

## **23 Whistleblowing Policy**

### **23.1 What is Whistleblowing?**

23.1.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### **23.2 How to raise a concern**

23.2.1 We hope that in many cases you will be able to raise any concerns with your Line Manager. However, where you prefer not to raise it with your Line Manager for any reason, you should contact your Managing Director or another Director.

23.2.2 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.

### **23.3 Confidentiality**

23.3.1 We hope that employees will feel able to voice whistleblowing concerns openly under this Policy. Please be aware that completely anonymous disclosures are difficult 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.

### **23.4 External Disclosures**

23.4.1 The aim of this Policy is 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 disclose to anyone externally.

23.4.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or external professional aligned to the business. We strongly encourage you to seek advice before reporting a concern to anyone external.

### **23.5 Protection and Support for Whistleblowers**

23.5.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern.

23.5.2 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. However, if we conclude that a whistleblowers has made false allegations maliciously or with a view to personal gain, the whistleblowers may be subject to disciplinary action.