



WHISTLEBLOWING POLICY

In compliance of the Public Interest Disclosure Act 1998, the Employment Rights Act 1996, this policy sets out the framework for dealing with allegations of illegal and improper conduct. The Company is a values-led, purpose-driven organisation committed to acting professionally, fairly and with integrity in all business transactions. Our ethical codes and standards are shared at all levels and visibly integrated into our business social and environmental details.

We take pride in our operations and our commitment to the highest standards of transparency, probity, integrity and accountability, which are taken extremely seriously by our entire workforce.

This policy is intended to ensure that The Company complies with its duty under the above Acts and does not replace other specifically laid down statutory reporting procedures. This policy provides a means of making serious allegations about standards, conduct, financial irregularity, or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations from being victimised, discriminated against, or disadvantaged in any way.

Definition of a Whistle-Blower:

A whistle-blower is a person who exposes a person or organisation regarded as engaging in unlawful or immoral activity. The wrongdoing disclosed must affect others or be in the public interest.

Scope:

This policy applies to all persons working for or on behalf of The Company in any capacity wherever located.

This policy applies to, but is not limited to, allegations concerning serious wrongdoing such as:

- Conduct which is a criminal offence or breach of the law
- Unlawful, corrupt or irregular use of public funds or resources
- Gross negligence or mismanagement by Public Officials
- Abuse of authority
- Possible fraud and corruption
- Intimidation or bullying
- Serious Health & Safety risks
- Verbal, physical or sexual abuse
- Alleged miscarriage of justice
- Damage to the environment
- Any other unethical conduct



Reporting:

The Company upholds a policy of "stand up, speak up" in relation to concerns of any nature so any suspicion or request to act outside our standard business procedures should be reported immediately upon identification. Disclosure can be made in an email, letter, note, telephone call or other conversation.

Reporting may be done by raising a concern internally with either a Line Manager or Director, or externally through Third Party whistle-blowing channels such as the Police, Government, Media or HMRC.

Protected disclosures can be made direct to an appropriate authority (i.e. the Police) if you reasonably believe that:

- It is justified because of urgent or exceptional circumstances
- The Head of the organisation is involved in a serious wrongdoing
- You made a disclosure in accordance with our Company's internal procedures, but no action has been recommended or taken within 20 working days of your disclosure

Concerns can be raised at any time about an incident that happened in the past, is happening now, or it is believed will happen in the near future.

The Company will take appropriate action to protect a whistle-blower who makes a serious allegation of misconduct in the workplace from harassment or victimisation. No retaliatory action, disciplinary, civil or criminal proceedings will be taken against a person for making a protected disclosure or referring one to an appropriate Authority (i.e. the Police).

A whistle-blower will not be treated unfairly or lose their job because they "blew the whistle".

Confidentiality:

The Company will treat all allegations in the strictest confidence and will not disclose the whistle-blower's identity unless:

- that whistle-blower consents in writing to the disclosure of information; or
- the investigator reasonably believes that disclosure of identifying information is:
 - a) essential to the effective investigation of the allegations made; or
 - b) essential to prevent serious risk to public health, public safety, or the environment; or
 - c) essential to comply with the principles of natural justice

Identification will only be revealed after consultation with the whistle-blower



Allegations:

Wrongdoing can be classified in many ways e.g. violation of company policy/rules, malpractice, law, regulation, threat to public interest or nation security, fraud and corruption.

Whether a written or oral report is made, it is important that relevant information is provided and confidentially documented including:

- The name and contact details of the person (Declarant) making the allegation
- The background and history of the allegation (i.e. relevant dates and names and positions of those who may have been in a position to have contributed to the allegation)
- The specific reason for the allegation

Although someone making an allegation will not be expected to prove the truth of the allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Procedure for making an allegation:

Allegations should be made in the first instance to a Line Manager. However, depending on the seriousness and sensitivity of the issues involved, and who is suspected of the alleged misconduct, an employee should speak to a member of the Board of Directors. The Board of Directors will consider the issue(s) raised and discuss with the whistle-blower (Declarant) whether they wish to proceed with the allegations and ensuring investigation.

Action upon receipt of an allegation:

Our investigator will record details of the allegation and gather as much information as possible, (within 5 working days of receipt of the allegations) including:

- Recording the allegation
- Recording any documents supplied by the whistle-blower (Declarant)

In order to preserve confidentiality, the investigator will ask the Declarant for their preferred means of communication and contact details for use in all communication regarding the allegation. The investigator will also:

- Acknowledge the allegation in writing within 10 working days of receipt
- Indicate how The Company propose to deal with the matter
- Provide information on whistle-blower (Declarant) support mechanisms
- Advise whether any initial enquiries have been made
- Advise whether further investigations will take place and if not, why not



- Provide an estimate of how long it will take to provide a full and final response

If the allegation relates to fraud, potential fraud or other financial irregularity, The Company Financial Director will be informed immediately upon receipt of the allegation. The Financial Director will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to the Board of Directors and a decision will be made as to whether to inform the Police and HMRC.

Anonymous allegations:

Whistle-blowers are encouraged to put their name to an allegation wherever possible as anonymous claims are less powerful and may be difficult to substantiate/prove.

Anonymous allegations will still be considered at the discretion of The Company with consideration to the following:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Where the allegation has been made anonymously, The Company will be unable to communicate what action has been taken.

Untrue allegations:

No disciplinary or other action will be taken against a whistle-blower who makes an allegation in the reasonable belief that it distinctly affects others or is in the public interest. However, disciplinary action may be taken against a whistle-blower who makes an unfounded allegation (e.g. an allegation made frivolously, maliciously or for personal gain where there is no element of fact, evidence or public interest).

Support:

The Company will take steps to minimise any difficulties that may be experienced by the Declarant as a result of making an allegation.

The Declarant may nominate a Support Person of their choosing to attend any meetings or interviews in connection with the allegation. However, if the matter is to be subsequently dealt with through another procedure, the right to be accompanied will at that stage be in accordance with the relevant procedure.



If a Declarant is required to give evidence in Disciplinary Proceedings or a Criminal Court, The Company will arrange for appropriate advice on the procedures, and support mechanisms that are available. The Company accepts that whistle-blowers need to be assured that the matters have been properly addressed so, subject to legal constraints, will inform the Declarant of the outcome of any investigation.

Monitoring:

The Company Board of Directors have determined that a Confidential Register will be maintained to record the following details:

- The name and status of the whistle-blower (e.g. employee)
- The date on which the allegation was received
- The nature of the allegation
- Details of the person to whom the allegations(s) was reported
- Details as to whether the allegation is to be investigated
- Details of the investigator if the allegation is to be investigated
- The outcome of an investigation
- Any other details relevant to the allegations(s)

The Board of Directors will report annually on the operation of the above procedures, and on the whistle-blowing allegations made during the period covered by the report.

The report will not identify whistle-blowers.

RESPONSIBILITY FOR THIS POLICY:

The Company Board of Directors has overall responsibility for ensuring that this policy complies with The Company's legal obligations that all team members and associates comply with it.

The Company Leadership Team Members are responsible for ensuring that those reporting to them understand and comply with this policy, and that adequate regular training is provided on recognising and preventing financial crime.

Name: Padraig Murphy

Signed: 

Dated: 5th Mar 22

Position: Director