



Whistleblowing (Public Interest Disclosure Act 1998)

The main purpose of the system is to provide you with ready access to a safe and effective means of reporting any matters which fall within the 'qualifying disclosures' below, regarding the Company and/or its employees and workers.

Should you discover a situation which falls within one of the qualifying disclosures below, you are free to decide to whom you should report the matter, in terms of their seniority/position within the Company.

Qualifying disclosures - If an employee is to be protected, the disclosure must be one covered by the Public Interest Disclosure Act 1998. A qualifying disclosure is a disclosure which, in the reasonable belief of the employee tends to show one or more of the following:

- 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 particular legal obligation.
- That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- That the health or safety of any individual has been, is being, or is likely to be endangered.
- That the environment has been, is being, or is likely to be damaged.
- That bribery has been committed, is being committed, or is likely to be committed.
- That information indicating the occurrence of any of the above has been, is being, or is likely to be deliberately concealed.

The Company will support employees and any non-workers who make confidential disclosures and protect them from reprisals or victimisation as long as the employee makes the disclosure with reasonable belief and falls within one of the above qualifying disclosures. This also applies where the employee or non-employee make the disclosure with reasonable belief and falls within one of the above qualifying disclosures but which turns out later not to have been justified.

This policy should not be used for a complaint relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should follow the Company's grievance procedure.

It is acknowledged, that it is never easy to report a concern, particularly one which may relate to an unlawful act. However, you are urged to come forward with any concerns, at the earliest opportunity, so that matters can be dealt with promptly and effectively.

In the first instance, you may wish to discuss the matter, on an informal basis with your Line Manager if a employee or with a Senior Manager if a non-employee, preferably the Managing Director – Mr Simon Balderson or the Human Resources Manager – Mr Alan Stanworth.