

## Public Interest Disclosure (Whistleblowing) Policy

### Scope of Policy

The aim of this procedure is to encourage you to raise any genuine concerns you might have about certain wrongdoings within the company without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

At all times the company conducts its business with the highest standards of integrity and honesty. It expects all employees to maintain the same standards in everything they do. Employees are therefore encouraged to report any wrongdoing by the Company or its employees that falls short of these business principles.

### Whistleblowing – Public Interest Disclosure

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace but it is the aim of this policy to ensure that as far as possible our employees are able to tell us about any wrongdoing at work which they believe has occurred or is likely to occur.

We recognise that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that the Company itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter with the Company that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them for bone fide concerns.

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these. Employment contract concerns should not be addressed using the grievance process.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

### Interaction with the grievance procedure

You should not use this procedure for complaints relating to your own circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure

### Types of wrongdoing addressed by this procedure

If you genuinely believe that we, or any of our workers, has taken, is intending to take or has failed to take action that you reasonably believe could lead or amount to:

- A criminal offence;
- A failure to comply with any legal obligations.
- Bribery.
- A miscarriage of justice;
- Danger to the health and safety of any individual;

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- Damage to the environment, or
- The deliberate concealment of information concerning any of the matters listed above.

### Procedure:

If appropriate, discuss the matter with your Department Manager in the first instance (or HR Manager/Director if you are concerned with the behaviour of your Manager). If you make such a disclosure, you can disclose this information verbally or in writing you should provide full details and, where possible, supporting evidence.

An informal approach to your Manager will be treated as completely confidential and will not result in any report to anyone within the Company unless you agree.

If the matter requires further investigation such an investigation will be carried out and you will be informed of the outcome of the investigations and what, if any, action has been taken.

If you remain unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, you should refer the matter to your Senior Manager. When they have investigated your complaint they will tell you the result of the investigation and what, if any, action has been taken.

The Company undertakes that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result. In the event that you believe you are being subjected to a detriment by any person within the Company as a result of your decision to invoke the procedure you must inform your Senior Manager immediately and appropriate action will be taken to protect you from any reprisals.

If it should become clear that the procedure has not been invoked to raise genuine concerns, for example for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of the Company's disciplinary procedure.

The Company is keen to hear of any concerns that employees may have about wrongdoing at work and encourages them to use the procedure described above wherever possible.

The Company recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the Company reserves the right to make such a referral without your consent.

### Investigating allegations of wrongdoing

If you disclose information in accordance with this procedure, wherever reasonably practicable we will keep your identity confidential. We will investigate your allegation promptly. During the course of our investigation we may require your assistance. We discourage anonymous disclosures as they are likely to hinder effective investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat information about the

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investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Managing Director – Robi Bernberg.

If you are in any doubt call the Serious Fraud Office anonymously and explain your situation and they can advise you on the phone +44 (0)20 7239 7272

We will inform you of the outcome of the investigation as soon as practicable. We will take whatever action we consider to be appropriate.

### Action we may take

If you reasonably believe that the nature of your concern relates to any of the areas set out above and you disclose this information to the appropriate person under this policy in good faith, no action will be taken against you for making the disclosure.

We will, however, take appropriate action against any person found to be:

- Victimising another person for using this procedure (please tell any company Director if you think you have been victimised, or raise it formally under the grievance procedure if the matter is not remedied);
- Deterring any person from reporting genuine concerns under this procedure (please tell any company Director if you think you have been deterred, and raise it formally under the grievance procedure if the matter is not remedied), or Making a disclosure/allegation maliciously, in bad faith or with a view to personal gain.

For employees this action may involve us taking disciplinary action, in accordance with the company's disciplinary procedure, up to and including summary dismissal.

This policy does not form part of any employee's contract of employment.

The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.