

## Whistleblowing policy

We are committed to carrying out our business in a safe, honest and ethical way. Part of that is creating an open and supportive working environment where colleagues feel able to speak up about any suspected wrongdoing. This Policy details our process for dealing with whistleblowing. This policy applies to all colleagues and anyone working with us.

### Crucial bits

#### What is whistleblowing?

Whistleblowing is the term used when a colleague passes on information about wrongdoing. If you're concerned that any of the things below are happening, have happened or are likely to happen, we encourage you to raise this as soon as possible:

- any bribery, fraud or other criminal offence
- a miscarriage of justice
- a risk to health and safety
- a risk or actual damage to the environment
- a breach of any other legal or professional obligation

We particularly want our colleagues to report if they have any concerns that modern slavery is taking place within our organisation, the suppliers and agencies we work with, or within our local communities so that these matters can be investigated by the proper authorities.

You don't need to have any proof that any of these things are happening. As long as you have a reasonable belief, you should report your concerns. But if we find that you've knowingly made a false allegation, we may deal with this under the Disciplinary/Misconduct procedure.

Remember, if you've got a personal complaint or concern, like about how you're being treated at work, this isn't a whistleblowing matter. It would be covered under the Grievance Procedure.

### Protection for whistleblowing

If you've reported a reasonable belief that any of the things above are happening, then don't worry – we won't allow you to be treated badly because of it.

If you find out that a colleague has blown the whistle, you must not treat them badly because of it. If we think you might have done, we'll need to investigate and it may mean disciplinary action against you. And you might also be at risk of being found personally liable for your behaviour.

### Confidentiality

If you like, we'll make sure that we take steps to protect your identity, as far as we reasonably can. If you ask us to treat things confidentially we won't disclose your identity without your consent, unless we have to in order to look into your complaint or if it's required by law.

## Blowing the whistle

If you need to raise a concern, here's how you can go about doing it:

### Your manager

You can raise the issue with your line manager. But if your line manager's involved in the activity you have concerns about, or you don't feel able to speak to them, talk to another manager instead.

You can raise things either in person or write them a letter. Your letter needs to include what your concern is, why you think it's true and any other details you can give us. Remember to include your contact details. We may need to get in touch to talk about your concerns or to get some more details. You can raise your concerns anonymously if you like and we'll take these seriously. But it may be difficult for us to do a proper investigation if we can't talk to you about other information we might need.

### Other internal contacts

If you feel like you can't raise the matter with a manager in your team or business area, you can contact any of the following senior managers:

Peter Kiddle  
Alex Speed  
Alia Taub  
Liaquat Lal

### External contacts

If you feel that you can't raise your concern with any of the people listed above, or if you have but still have got concerns, you can contact "Speak Up" on [0800 374199](tel:0800374199) an anonymous, free and confidential service operated by [Expolink](https://www.expolink.com). It's a completely independent organisation with staff trained to handle whistleblowing calls. Your call won't be traced or recorded.

Expolink will pass all of the information you give during the call, apart from your name if you wish, to the relevant Risk and Internal Audit teams for them to look into.

### Relevant authorities

We'd really like you to raise any concerns internally first, to give us the chance to look into things. But you do have the option of reporting the matter to the Relevant Authority.

Depending on the type of concern you have, there are also other public bodies you can contact, such as:

- HM Revenue and Customs
- Competition and Markets Authority
- Health and Safety Executive
- Environment Agency
- Director of Public Prosecutions
- Serious Fraud Office

## Media

Just to remind you that it will very rarely, if ever, be appropriate to raise a whistleblowing concern directly to the media. And you should never tell the media about any concern that you've already raised which is being investigated.

## Things to think about

### Outcomes

Just so you know, because we need to keep things confidential, we may not be able to tell you about any investigation we do or action we take about the issue you've told us about. But wherever we can, we'll try to let you know the outcome. We trust that you'll treat any information we do give you as confidential.

### If you need further support

If you have any further questions about whistleblowing, speak to your manager. If managers receive information about a whistleblowing concern they can contact our Directors.