

WHISTLE-BLOWING POLICY

Policy statement

The Company is committed to maintaining the highest standards of honesty, transparency and accountability and takes any malpractice very seriously in all its business dealings. It is recognised that employees are often the first to know when someone connected with the Company is doing something wrong and you are encouraged to voice any concerns in accordance with the procedures set out over the following page.

Activities Covered

The following activities are considered by the Company to constitute misconduct or malpractice and are covered by this procedure:

- Criminal offences
- Failure to comply with legal obligations
- Accepting gifts which are intended to influence decision making
- Actions which cause risk to health and safety of employees or customers
- Actions which cause risk to the environment
- Concealment of any of the above
- False or inaccurate reporting of operational or financial performance and company assets

This list is not exhaustive and the Company will evaluate any concern that is raised which is in the public interest. Please note however that any false report which is made with malicious intent or for personal gain could lead to disciplinary action.

Raising a Concern

Although a concern can be raised to certain public authorities, the conditions under which this may be covered by the protection of the legislation are limited. Therefore, you should always raise a concern in the first instance with the Company.

Depending on the seriousness of any malpractice and who you think is involved you can address your report to your line manager or their superior.

The report can be made orally or in writing. If you choose to make a report orally you can bring a colleague with you if you wish. If you wish to raise the matter in confidence this should be made clear when you make the report.

Anonymous Reporting

You can make a report anonymously but it may be harder to investigate and it is therefore best to declare your identity.