

Whistleblowing policy

The aim of the policy is to ensure that you are confident that you can raise matters of genuine concern without fear of reprisals, in the knowledge that your concerns will be taken seriously and investigated appropriately.

This policy is non contractual.

Policy

We are committed to conducting our business with honesty and integrity, and we expect all Staff to maintain high standards. We believe we have a duty to take appropriate measures to identify any wrongdoing within the firm and attempt to remedy it.

Whistleblowing is when an employee or worker makes a qualifying disclosure, which they reasonably believe is in the public interest, to an employer, responsible person, legal adviser, government minister or other prescribed person about a matter which, in the whistleblower's reasonable belief, tends to show a criminal offence, breach of a legal obligation, miscarriage of justice, danger to health and safety, damage to the environment or deliberate concealment of any of those. In these circumstances and, subject to fulfilling certain criteria, it will be a protected disclosure and the whistleblower will be protected from being dismissed or subjected to a detriment on grounds of that disclosure. Employees who whistleblow are protected by the Public Disclosure Act 1998.

If you have any concerns about malpractice in the workplace, you are expected to raise such concerns internally in accordance with the procedure set out in this policy. It is your responsibility to raise any concerns that you may have about malpractice in the workplace.

If you raise a genuine concern in good faith in accordance with this policy, the Company wishes to reassure you that it will take all reasonable steps to protect you from any form of retribution, victimisation, harassment or detriment. You have statutory protection if you raise concerns in the right way. Providing you are acting in the public interest, we will take your concern seriously and it does not matter if you are mistaken.

The protection afforded by this policy does not extend to you if you maliciously raise a concern that you know is unfounded or untrue. Employees who abuse this policy by making allegations which are false and malicious or by disclosing information in an inappropriate way (e.g. through contacting the media) will be subject to disciplinary proceedings, which could include dismissal, while other staff members may no longer be provided with work or their contract with us may be terminated immediately without notice or compensation.

Matters covered by whistleblowing policy

This policy is distinct from the Company's Grievance Procedure and Anti-Harassment and Bullying Policy. If you have a complaint relating to your personal circumstances in

the workplace then you should use the Grievance Procedure or Anti-Harassment and Bullying Policy (as appropriate). This Whistleblowing Policy is for use if you have concerns about wrongdoing within the Company.

It is impossible to give an exhaustive list of the activities that would constitute malpractice, but broadly speaking the Company would expect you to report the following:

- where a criminal offence has been committed, is being committed or is likely to be committed;
- where a person has failed, is failing or is likely to fail to comply with their legal obligations;
- where a miscarriage of justice has occurred, is occurring or is likely to occur;
- where the health and safety of any individual has been, is being, or is likely to be endangered;
- where the environment has been, is being or is likely to be damaged; or
- any action intended to conceal information regarding any of the above matters
- In the context of the Company's business, particular areas where concerns may arise include gross misconduct under the Company's Disciplinary Procedure, conflicts of interest, breach of confidentiality or security obligations, breach of the Company's Fraud Prevention and Anti-Money Laundering Policy, breach of the Company's Ethical and Anti-Corruption and Bribery Policy, the provision of negligent advice, harassment occurring to others and breach of health and safety rules. If you are in doubt as to whether any matters which are of concern to you come within the scope of this policy, the Company encourages you to raise them.

The Company recognises that you may prefer to make an anonymous report, however you are encouraged not to do so. Although all reports, anonymous or otherwise, will be investigated, proper investigation may prove impossible if further information cannot be obtained from you.

Reporting a concern

You should report concerns about any form of malpractice in the first instance to your manager. If, for whatever reason, you feel you cannot speak with your manager about your concern or if you think your concern has not been handled properly, then you should raise your concern with Personnel.

Once you have told us of your concern, we will look into it carefully and thoroughly to assess what action, if any, should be taken. Depending on the subject matter of the disclosure, this may mean an internal enquiry or a longer investigation. You will be told who will be conducting the investigation and how long it is likely to last. You will be kept informed of developments and of the outcome of the

investigation to the extent that this is appropriate and practicable in the circumstances. However, the need for confidentiality may prevent the Company from being able to give you specific details of the investigation or actions taken. The Company will aim to carry out the investigation in a timely manner. Depending on the findings of the investigation, internal and/or external procedures may be invoked in order for appropriate action to be taken.

Confidentiality

The Company will make every effort to keep your identity confidential if this is desired. However, there may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. If this is the case, the Company will make efforts to inform you. The Company will take all reasonable steps to protect you from any victimisation or detriment as a result of having made a disclosure.

In order not to jeopardise the investigation into the alleged malpractice, you will be expected to keep the matter confidential.

External reporting

The purpose of this policy is to give you the reassurance you need to raise concerns internally. It is therefore hoped that external reporting will not be necessary. However, in some serious circumstances or following an internal report which has not addressed the malpractice, it may be appropriate for you to report your concerns to an external body. The Company would rather you raise a concern with the appropriate regulator than not at all.

The independent charity called Protect (previously known as Public Concern at Work) may provide advice as to which external body or bodies your concern should be reported to. You can call the Protect Advice line on 020 7404 6609 or email whistle@protect-advice.org.uk. The link to their website is <https://protect-advice.org.uk/contact-us/>.

Protection against detriment

If you take action under the Public Disclosure Act 1998 you will be protected from any detriment in relation to any allegations that are made.

If you do not follow the procedure set out, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply.

Territory

This policy has been prepared principally with reference to the laws of England and Wales, but the Company is committed to compliance with the laws and regulations of all jurisdictions in which it operates. This policy shall accordingly be read and interpreted, as far as is possible, so that it is in line with the applicable legal jurisdiction and the Company reserves the right to depart from the terms of this policy as may be necessary to comply with legal requirements.

Ridha Bentiba
Executive Director, HR Wallingford Ltd

Signed:



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