

# Whistleblowing Charter



In keeping with the principles set out in our **Employee Handbook**, the Board is not prepared to permit any member of staff to sully our hard-earned reputation through any type of malpractice.

In line with the UK Corporate Governance Code 2014, this charter seeks to provide an environment in which staff who hold vital information or a legitimate suspicion of malpractice, which might reflect adversely on our integrity or reputation, may in confidence, disclose that information or suspicion as soon as possible without fear of corporate retribution or penalty.

The following procedure applies to all full and part-time employees (whether permanent or temporary), self-employed contractors and agency staff and covers malpractice which includes but is not confined to:

- A criminal offence (including offering or taking bribes)
- A breach of civil law
- A danger to the safety or health of any person
- Damage to the environment

and any deliberate covering up of information tending to show any of the above.

## Raising a malpractice concern

If you are a person covered by this procedure and you reasonably believe that malpractice has been, is being or is likely to be committed and you are acting in good faith you should inform your Head of Discipline/ Head of Region. If your concern involves that manager or for any reason it is inappropriate for them to be told of it or it arises at the head office, you should raise your concern, in confidence, with the Chief Executive Officer, Chief Financial Officer or Company Secretary. If appropriate, the latter shall ensure that an independent investigation is conducted and, where possible, the outcome notified to you within a reasonable time.

## Advice & Contacts

If you feel the need to take advice before raising a malpractice concern you can contact Public Concern at Work, an independent charity, on 44 (0) 207 404 6609 or by e-mail [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). They provide free confidential legal advice on whistleblowing matters.

If you raise a malpractice concern and you are concerned about the response or lack of response or if you feel that the concern cannot be raised internally then you can contact the following:

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- The Chairman of our Audit & Risk Committee whose contact details can be obtained from the Company Secretary; or
- If relevant, one of the prescribed regulators listed under the Public Interest Disclosure Act 1998.

A list of these regulators can be found at the Public Concern at Work website ([www.pcaw.co.uk](http://www.pcaw.co.uk))

- The Financial Conduct Authority's whistleblowing help line on +44 (0) 207 066 9200 or email [whistle@fca.org.uk](mailto:whistle@fca.org.uk)

## Legal

The Public Interest Disclosure Act 1998 provides legal protection to workers who report malpractices by their employers against victimisation or dismissal. Under the Act, employers are not permitted to treat legitimate whistleblowers as trouble makers or to ignore their concerns. All such disclosures shall as far as possible be treated as confidential and the Company will not tolerate any discrimination by employees or management against an employee acting in good faith.

A handwritten signature in black ink, appearing to read 'Douglas McCormick'.

Douglas McCormick  
Chief Executive Officer

<b>Title:</b>	Whistleblowing Charter		
<b>Author/ Responsibility:</b>	Company Secretary	<b>Date:</b>	22 June 2017
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