

PUBLIC INTEREST DISCLOSURE POLICY

- 1. We strive at all times to conduct our activities with the highest standards of integrity and honesty. It is therefore expected that all employees maintain the highest standards in these areas in all of their work decisions and performance. Employees are therefore encouraged to report any wrongdoing or actions by employees that fall short of these business principles.
- 2. Legislation exists to protect employees who report wrong doing within the workplace and it is the aim of this policy to ensure that, as far as possible, an employee is able to tell the company about any wrongdoing at work which it is believed has occurred is occurring or is likely to occur.
- 3. We recognise that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that the organisation itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.
- 4. Each employee is encouraged to set out in writing to the company any concerns at all about wrongdoing at work, including any criminal offence, failure to comply with legal obligations, miscarriage of justice, health and safety danger, environmental risk or concealment of any of these situations. If appropriate, employees are encouraged to discuss the matter informally with their manager in the first instance. Any formal or informal approach to a manager will be treated as completely confidential.
- 5. If the matter requires further investigation, such an investigation will be carried out and the employee will be informed of the outcome and what, if any, action has been taken. This may of course involve meetings with the employee and others which we encourage in order to assist any investigations.
- 6. If the employee is unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, the matter should be referred to another senior member of staff. When the complaint has been investigated, the employee will be informed of the result and what, if any, action has been taken.
- 7. We undertake to ensure that no employee who makes a bona fide report under this policy will be subjected to any detriment, bullying or harassment from another employee. In the event that an employee believes they are being subjected to a detriment by any person within our employment as a result of their decision to invoke the policy, the employee must inform an appropriate person immediately and appropriate action will be taken.
- 8. The disclosure is not protected unless the employee reasonably believes that the disclosure is made in the public interest. If it should become clear that the policy has not been invoked by the employee as outlined above, for example, for malicious reasons or to pursue a personal grudge against another employee or the Company, this will be dealt with in accordance with the disciplinary procedure and may in serious cases lead to the termination of employment.

Policy reviewed by Sam Swift in January 2023 – next review in January 2024