

Disclosure of Information (Whistle-blowing) Policy

1. Introduction

This policy is provided to assist individuals who believe they have discovered acts of malpractice or impropriety within the company, and sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with. The policy offers protection to those who make a disclosure, provided the disclosure is made in the reasonable belief that it will highlight malpractice or impropriety.

The policy applies to all employees of the company. Other individuals performing functions in relation to the company, such as agency workers, contractors and suppliers are also encouraged to use it.

The policy is not designed to question financial or business decisions taken by the company nor should it be used to reconsider any matters which have already been addressed under the company's disciplinary, grievance or other procedures.

2. Principles

By encouraging a culture of openness, the company believes that it can help prevent acts of malpractice. The company considers malpractice to include:

- Any illegal activity within the company
- Any activity that causes the company to breach its legal obligations
- Any activity that causes the company to endanger the health and safety of any person
- Any activity that damages the environment
- Any miscarriage of justice
- Any attempt to wilfully conceal any information that tends to show malpractice

The law provides protection for workers who raise legitimate concerns about acts of malpractice under the Public Interest Disclosure Act 1998. These are called "qualifying disclosures".

It is not necessary for an employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The person making the disclosure has no responsibility for investigating the matter - it is the company's responsibility to ensure that an investigation takes place.

An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure. The company encourages everyone to raise concerns about acts of malpractice under this procedure. If an employee is not sure whether or not to raise a concern, they should discuss the issue with their line manager or an HR Business Partner.

The company will treat disclosures in a confidential and sensitive manner. The identity of the individual making the allegation will be kept confidential so long as it does not hinder or frustrate any investigation, in which case the individual's consent will be sought before making any disclosure.

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if they persist with making them, disciplinary action may be taken against that individual.

3. **Procedure - Employees**

Stage 1 - In the first instance, and unless an employee reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the employee does not wish to approach their line manager, any concerns should be raised with the employee's line manager. Alternatively, the employee should proceed straight to stage 3.

Stage 2 - The line manager will arrange an investigation into the matter, either by investigating the matter personally or immediately passing the disclosure to someone in a more senior position. The investigating officer will then report all findings to the divisional director, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the investigating officer will report the matter to the Human Resources Department and the disciplinary procedure will be invoked. On conclusion of any investigation, the employee will be informed of the outcome of the investigation. If no action is taken, the reason for this will be explained. The investigating officer's decision is final and there is no right of appeal.

Stage 3 - If the employee is concerned that their line manager is involved in the wrongdoing, has failed to undertake a proper investigation or has failed to report the outcome of the investigations to the divisional director, they should inform an HR Business Partner. The HR Business Partner will arrange for another operations manager to review the investigation carried out, make any necessary enquiries and make their own report to the divisional director as in stage 2. If for any other reason the employee does not wish to approach their line manager they should contact the HR Business Partner. Any approach to an HR Business Partner will be treated with the strictest confidence and the employee's identity will not be disclosed without their prior consent.

Stage 4 - If on conclusion of stages 1, 2 and 3 the employee reasonably believes that the appropriate action has not been taken in relation to a genuine qualifying disclosure, they should report the matter to the Group HR Director.

4. **Procedure – Non Employees**

Non employees who wish to make a 'Qualifying Disclosure' should either contact an HR Business Partner by telephoning 0121-568-2905, who will note the details of the disclosure and investigate the issue as quickly as possible or they should email the company at HR@afblakemore.com.