

Whistleblowing Policy

This policy sets out how the company will deal with persons who report suspected wrongdoing or dangers in relation to our activities.

1.1. About this policy

We are committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, interns, casual workers and agency workers.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

1.2. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, and any breach of legal or professional obligations.

If you are to be protected, the Public Interest Disclosure Act must cover the disclosure. A qualifying disclosure is made in good faith, in the reasonable belief that the allegations are substantially true, not for personal gain, and is reasonable in all the circumstances for which the disclosure is made. If this is found not to be the case, your disclosure will not be protected and you may be liable to disciplinary action, up to and including dismissal.

1.3. How to raise a concern

If at any time you feel that you need to raise a concern, you should follow the process below.

The disclosure must, in your reasonable belief, show one or more of the following within the company:

- A criminal offence has been, is being, or is likely to be committed
- Someone has failed, is failing or is likely to fail to comply with their legal obligations
- A miscarriage of justice has, or is likely to occur
- The health or safety of someone has been, or is likely to be endangered
- The environment has been, is or is likely to be damaged

If information about any of the above has been, or is likely to be deliberately concealed, we hope that you will be able to raise any concerns with your manager. Where you prefer not to raise it with your manager for any reason, you should contact your local HR Manager or Chief Security Information & Security Officer. Contact details are at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

1.4. Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy, as completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

1.5. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

1.6. Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform our Head of HR Operation or Chief Security Information & Security Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Protect operates a confidential helpline. Their contact details are at the end of this policy.

Contacts

Group Head of HR Heather Sansom	01256 391002 heather.sansom@scgconnected.co.uk
Chief Information and Security Officer James Smith	07867 574910 James.smith@scgconnected.co.uk
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk