

## **Whistleblowers (Public Interest Disclosure)**

### **Scope**

This policy ("Policy") is applicable to all Ipeco's employees, agents, consultants, and any other persons who perform work for or on behalf of Ipeco. All references in this policy to Ipeco refer to Ipeco Holdings Limited as well as to all other companies and branches of companies in the Castledon Ltd group of companies.

### **Introduction**

It is understood that employees, at one time or another, have concerns about what is happening at work or within the organisation. Generally, these concerns can be easily resolved. However, some concerns may be about serious malpractice.

This policy therefore provides a procedure to enable employees to raise concerns about actual or possible serious malpractice at an early stage and to provide assurance to employees that any matters raised will be dealt with seriously, without fear of reprisal and, where possible, confidentially.

Ipeco is committed to operating its business within current legislation and to the highest standards of professional conduct. In order to operate effectively within these values, it is essential that employees feel able to raise concerns with Ipeco.

### **Concerns about Malpractice**

It is not possible to give an exhaustive list of the activities that might constitute misconduct or malpractice but, broadly speaking, employees would be expected to report any of the following:

- Criminal offences (including, for example, fraudulent and dishonest behaviour)
- Failure to comply with any legal obligations or regulatory requirements
- Miscarriages of justice
- Actions that endanger the health and/or safety of employees, customers or the public
- Actions which cause damage to the environment
- Bribery and/or corruption (please also see Bribery and Ethics policy)
- Any form of harassment, victimisation and/or discrimination (including, for example, discrimination based on the grounds of race, sex, political affiliation, religion or gender),
- Financial fraud or mismanagement
- Conduct likely to damage our reputation or financial well being

- Unauthorised disclosure of confidential information
- Actions which are intended to conceal any of the above.

In order to raise a concern, the employee does not have to have evidence of the malpractice, but must have a reasonable belief that the malpractice has occurred or about to occur.

### **Raising a Concern**

If an employee has a concern, they should report it under this policy. We hope in many cases employees will be able to raise any concerns with their line manager to raise this. If, however, an employee feels unable to do this for any reason, they should raise their concern with a Vice President or Director.

Where possible, employees should put their concern in writing in order to outline the nature of the suspected malpractice. Alternatively, concerns can be raised verbally, but employees should make it clear at the outset that they are raising a concern under the Whistleblowers Policy, in order to avoid any misunderstanding about the confidentiality, nature and seriousness of the verbal communication. When raising a concern, the employee must declare any personal interest they may have in the matter.

The Company does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Company cannot obtain further information from the employee raising a concern. It would also make it more difficult to establish whether any allegations are credible. Employees who are concerned about possible reprisals, if their identity is revealed, should make this clear so that appropriate measures can be considered to maintain confidentiality. If an employee is in doubt, they could also seek support from any VP or Public Concern at Work (see below).

### **Complaints relating to personal circumstances**

This policy should not be used for complaints relating to an employee's own personal circumstances, such as the way they have been treated at work. In those cases, employees should instead use the Grievance Procedure.

### **Investigation**

Having been alerted to a concern, it is Ipeco's responsibility to investigate the issue. This will include discussions with the employee followed by an assessment as to what further action or investigation is required. Should an employee wish to attend a meeting to discuss their concerns with a colleague, they will be permitted to do so. Any companion will be required to respect the confidentiality of the disclosure made and any subsequent investigation.

All concerns raised under this procedure, regardless of their nature, will be treated seriously and sensitively. Where practicable, immediate steps will be taken to remedy and/or address the situation; however, depending on the nature of the concern that has been raised, it may take a period of time to fully investigate the matter.

Every effort will be made by Ipeco to maintain confidentiality if the employee so wishes. If this is not possible, this will be fully discussed with the employee (e.g. if the outcome includes Court proceedings or disciplinary action).

Employees will be informed of the outcome of the action taken to resolve the concern (subject to legal constraints) including confidentiality obligations to other employees which may, for example, preclude detailing any disciplinary action taken. Where no action is taken, a full explanation will be given as to why no action has been taken. Information provided to an employee regarding the investigation and any outcome should be treated as confidential.

If following investigation, it is found that any employee has raised false allegations maliciously or with a view to personal gain, the employee will be subject to disciplinary action.

### **If you are not satisfied**

Whilst the Company cannot always guarantee the outcome an employee is seeking it will try to deal with any concern raised fairly and in an appropriate way. This policy is designed to encourage employees to help the Company achieve this. If an employee is not happy with the way in which their concern has been handled, this should be raised with a Director of the Company.

### **Employee Protection**

Ipeco will not tolerate harassment or victimisation of anyone who raises a concern under this procedure, regardless of whether or not the concern is established by Ipeco to be well founded.

Those who raise a concern have a right not to be subject to any detrimental treatment, including dismissal, disciplinary action, threats or any other unfavourable treatment connected with raising a concern.

Employees should not be discouraged from raising concerns due to actual or possible pressure from other work colleagues, employees or management. Discouraging another person to come forward with a concern is a disciplinary offence and will be dealt with under the Disciplinary Procedure.

Employees are further protected under legislation (for example, the Public Interest Disclosure Act 1998) against being dismissed or being subject to some other detriment because they have raised a concern about possible malpractice.

### **Raising Concerns Externally**

Ipeco would prefer employees to raise concerns using the above procedure. Employees may, however, despite the assurances provided in this procedure, feel unable to raise concerns internally and believe that it is more appropriate to raise their concern with an external organisation, such as a regulator. It is open to all employees to do so. It will rarely, if ever, however, be appropriate to contact the media.

There is a list of prescribed organisations to which disclosures may be made (see the Public Interest Disclosure Act 1998, as amended by the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2003).

Employees may also wish to seek advice before raising a concern and may contact Protect ([www.protect-advice.org.uk](http://www.protect-advice.org.uk)), a registered charity that advises on serious malpractice within the workplace. They can be contacted on 020 3117 2520 or [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk).

### **Status of and Variations to Policy**

This policy does not form part of an employee's contract of employment. Ipeco's decision as to the interpretation and operation of this policy is final. Ipeco reserves the right to amend, review or terminate this policy at any time.