

## Disclosure of Public Interest Matters (Whistleblowing) Policy

The Company recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Company's success ensured.

This policy is designed to provide guidance to all those who work with or within the Company (including casual and temporary employees) who may from time to time feel that they need to raise certain issues relating to the Company with someone in confidence.

Any person who in public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage because of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure is a disciplinary offence.

This policy applies where you reasonably believe that one of the following sets of circumstances is occurring, has occurred or may occur within the Company:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject.
- A miscarriage of justice has occurred, is occurring or is likely to occur.
- The health and safety of any individual have been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- Information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

It is not necessary that you prove the breach or failure that you are alleging has occurred or is likely to occur but may simply raise a reasonable suspicion.

However, you should note that you will not be protected from the consequences of making such a disclosure if, by doing so, you commit a criminal offence or if you make the disclosure motivated by a reason which is not in the public interest.

### *Procedure*

If you believe that any of the above practices are happening in the Company, the following procedure should be followed:

|             |   |              |                   |
|-------------|---|--------------|-------------------|
| Document    | Disclosure of Public Interest – Whistleblowing Policy | Date Created | 25 September 2025 |
| Created by  | Tina Evans – Head of HR, Facilities and Governance    | Version No   | 1                 |
| Approved by | Helen Hardy - CEO                                     |              |                   |



## **Disclosure of Public Interest – Whistleblowing Policy**

- First raise the issues with your Line Manager, who will treat the matter with confidence.
- If it is not appropriate to raise the issues with your Line Manager, you should raise the issue with a member of SMT or HR.
- You will need to explain fully the nature and extent of what you believe is the problem. You may bring a colleague to help you explain the situation more clearly if you wish.
- Depending on the nature of your complaint, it may not be possible to find an immediate solution, but your concerns will be investigated as quickly as is reasonably possible and you will be advised of the outcome of the investigation in due course.
- Where it is necessary for you to attend a disciplinary or investigative hearing as a witness appropriate step/s will be taken to ensure that your working environment and/or working relationship is/are not prejudiced by the fact of the disclosure.
- If you are dissatisfied with the outcome of this procedure you may raise the matter with the Chief Executive Officer, if you remain dissatisfied with the outcome you have the right to express your concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 1999 or any statute or statutory instrument which subsequently supersedes this legislation.

This policy will apply where a disclosure is made and where you reasonably believe that the information disclosed and any allegation contained in it are substantially true.

If any disclosure is made in bad faith (for instance, to cause disruption within the Company, or concerns information which you do not substantially believe is true, or indeed if the disclosure is made for personal gain, then you will become subject to action under the Disciplinary Procedure, which could include dismissal

|             |   |              |                   |
|-------------|---|--------------|-------------------|
| Document    | Disclosure of Public Interest – Whistleblowing Policy | Date Created | 25 September 2025 |
| Created by  | Tina Evans – Head of HR, Facilities and Governance    | Version No   | 1                 |
| Approved by | Helen Hardy - CEO                                     |              |                   |