

## **Whistle-blowing (Public Interest Disclosure) Policy**

### **1. Introduction**

This policy is provided to assist you if you believe you have discovered acts of wrongdoing within the company, including suspected misconduct, illegal acts or failure to act on serious issues within the business and sets out the way in which you may raise any concerns that you have and how those concerns will be dealt with.

The policy offers protection to anyone who makes a disclosure, provided the disclosure is made in the reasonable belief that it will highlight wrongdoing in our business. We aim to ensure that you can raise your concerns within the business without fear of victimisation, subsequent discrimination, disadvantage or dismissal for reasons connected with the disclosure.

As colleagues are often the first to realise that there may be something seriously wrong within the business, 'Whistleblowing' is viewed as a positive act that can make a valuable contribution to our overall efficiency and long-term success. It is not disloyal to colleagues or the business to speak up.

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 wrongdoing. The company considers wrongdoing to include:

- Any illegal activity within the company
- Any incidents or suspected incidents of Bribery and/or Corruption
- Any incidents or suspected incidences of Modern Slavery
- Any activity that causes the company to breach its legal obligations
- Any activity that causes the company to endanger the health, safety or wellbeing of any person
- Any activity that damages or could damage the environment
- Any miscarriage of justice
- Any attempt to wilfully conceal any information that tends to show malpractice
- Any failure to act on known serious issues in the business that could result in any of the above

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 you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. Should you make a disclosure it is not your responsibility for investigating the matter - it is the company's responsibility to ensure that an investigation takes place.

The company encourages you to raise concerns about acts of wrongdoing under this procedure. If you are not sure whether or not to raise a concern, you should discuss the issue with your line manager or an HR Business Partner.

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

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

### **3. Procedure - Colleagues**

Stage 1 - In the first instance, and unless you reasonably believe your line manager to be involved in the wrongdoing, or if for any other reason you do not wish to approach your line manager, any concerns should be escalated to their line manager. Alternatively, you should proceed straight to stage 3.

Stage 2 – Your 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, you will be informed of the outcome of the investigation. If no action is taken, the reason for this will be explained to you.

Stage 3 - If you are concerned that your 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, you should inform a 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 you do not wish to approach your line manager, you should contact the HR Business Partner. Any approach to a HR Business Partner will be treated with the strictest confidence and your identity will not be disclosed without your consent.

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

### **4. Procedure – Non-Employees**

If you are not an Employee and 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 you should email the company at [HR@afblakemore.com](mailto:HR@afblakemore.com).