



WHISTLEBLOWING POLICY

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(a) All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The Company believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation the Company believes it can help prevent malpractice—prevention is better than cure. That is the aim of this policy.

(b) By encouraging a culture of openness the Company wants to encourage you to raise issues which concern you at work. You may be worried that by reporting such issues you will be opening yourself up to victimisation or detriment, or risking your job security; that is quite understandable. However, all staff now enjoy statutory protection if they raise concerns in the right way. This policy is designed to give you that opportunity and protection. Provided you have reasonable belief that your disclosure is in the public interest and you comply with this Whistle Blowing Policy it does not matter if you are mistaken.

(c) If there is anything which you think the Company should know about please use the procedure outlined in this policy. By knowing about malpractice at an early stage the Company stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please, do not hesitate to “blow the whistle” on malpractice.

(d) This policy is not the normal Grievance Procedure. If you have a complaint about your own personal circumstances then you should use the normal Grievance Procedure. If you have concerns about malpractice within the organisation then you should use the procedure outlined in this policy.

Policy

(e) The Company is committed to this policy. If you use this policy to raise a concern the Company gives you its assurance that you will not suffer any form of retribution, victimisation or detriment. The Company will treat your concern seriously and act according to this policy. You will not be asked to prove anything. If you ask for a matter to be treated in confidence the Company will respect your request and only make disclosures with your consent as far as possible. You will be given feedback on any investigation and the Company will be sensitive to any concerns you may have as a result of any steps taken under this procedure.

(f) If you are concerned about any form of malpractice you must complete the Whistle Blowing Form, a copy of which can be found at Appendix A of this Employee Handbook and a copy of this form passed to the designated Whistle Blowing Officer, Liam Keene.

How the Company will respond

(g) After you have raised your concern the Company will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.

(h) As far as possible, the Company will keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

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Raising your concern externally (exceptional cases)

(i) The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take.

(j) However, if for whatever reason, you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with the appropriate regulator.

(k) Caution: If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making wider disclosure. However, whistleblowers who make wider disclosures of this type will only be protected (from victimisation and suffering detriment) in certain circumstances. The Company recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.

Signed: 

Position: Managing Director

Date: 05/01/2026