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Whistleblowing Policy
Confidential Reporting

Whistleblowing Policy (Confidential Reporting)

General

In this policy 'Whistleblowing' means the reporting of actual or suspected misconduct, dangerous or illegal activity or failure to act within the Company code of conduct.

Aim of the policy

The policy is designed to ensure that all internal and external stakeholders affected by our operations can raise a concern or grievance about any actual or suspected misconduct, dangerous or illegal activity or failure to act within the Company code of conduct and reassured that any concern raised will be fully investigated without fear of prejudice, victimisation, discrimination, disadvantage, or dismissal. Its aims are for all internal and external stakeholders are:

- to encourage confidence to raise a concern or grievance at the earliest opportunity.
- provide methodology to raise a concern or grievance and receive feedback on any action taken.
- ensure effective investigative response and accurate feedback and timely remedy to any concern or grievance escalatory options if the response is deemed inadequate.
- reassurance of and protection from any potential retribution, reprisal or victimisation.

Internal and external stakeholders who can raise a concern under this policy.

- employees and contractors
- sub-contractors and their employees
- partners/suppliers and their employees
- any third party impacted by company operations

What should be reported?

Any serious concerns that you have about service provision or the conduct of officers or members of the Company or other stakeholders acting on behalf of the Company that:

- Has acted contrary to the Company's code of conduct and values, and/or standards of practice.
- Results in the breach or abuse of a person's human rights abuses, inc. sexual exploitation.
- A criminal offence has been committed is being committed or is likely to be committed.
- A person has failed, is or is likely to fail to comply with any legal obligation to which he/she is subject.
- A miscarriage of justice that has occurred, is occurring, or is likely to occur.
- The health or safety of any individual has 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 of the above, is being, or is likely to be, deliberately concealed.
- The business or an associated person has been, is being, or is likely to be receiving or offering bribes.

- A Government of foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

Protecting the Whistleblower

Legal rights

This policy has been written to encourage and protect the rights of internal and external stakeholders raising concerns and the legal rights are protected under law, underpinned by the code of conduct and all supporting policy and procedure.

Harassment or Victimisation

The Company is committed to best practice and the highest standards in support of all stakeholders.

The Company recognises that any decision to report a concern could potentially be a challenging prospect and therefore all stakeholders are encouraged to raise concerns in the knowledge that those will be treated with urgency and diligence.

The Company will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect that individual or group.

Support

Throughout this process:

- full support from the management team.
- all concerns taken seriously and thoroughly investigated.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the individual or group if desired by those stakeholders. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of disclosure without assistance from the stakeholder raising the concern and therefore the individual or group may be asked to act as a witness but only ever with prior agreement and if so offered advice and support throughout.

Anonymity

The policy encourages those raising concerns to do so in person, however, if the stakeholder is uncomfortable doing so, preferring to raise their concern anonymously then this will be treated with the same seriousness and diligence as any other concern, however, feedback will be harder to achieve.

Untrue Allegations

If a concern or allegation is investigated and found to be unfounded or untrue and the source is found to be

frivolously, malicious, or deliberately misleading, appropriate disciplinary action may be taken.

How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier the Company can act. The following information is required:

- the nature of your concern and any substantive supporting evidence
- the context, history of the concern if relevant

Stakeholders raising a concern will be asked to provide as much information as possible in accordance with the above guidelines so that the concern can be substantiated, and a proper due process undertaken if the concern is deemed to be a legitimate submission.

It might be prudent for the person or group raising the concern to invite a representative from a trade union, professional association or a friend or colleague to be present for support during any meetings or interview in connection with the concern raised.

What the Company will do

The Company will respond to concerns as quickly as possible.

To be fair to all stakeholders, including those who may be implicated, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e., by not informing the subject of the concern until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of inappropriate conduct or human rights violation, more immediate intrusive action may be required inc. in the case of Company employees and consultants, suspension from the place of work may have to be considered immediately.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the law enforcement authorities
- be referred to an external auditor

Within ten working days (or sooner if possible) of a concern being raised, the person investigating the concern will engage with the stakeholder:

- acknowledging that the concern has been received
- indicating how the Company proposes to deal with the matter
- supplying you with information on support mechanisms
- confirmation on status of further investigation

The level of interaction between the stakeholder and Company officer considering the issues will depend on the nature of the matters arising from the concern raised, the potential difficulties involved, and the clarity of information provided. It is likely that an interview will be required to ensure full disclosure is provided and details captured.

If such interview is required and possible, it can be arranged off site from the Company office(s) or online if face to face is not possible. A union or professional association representative or a friend/colleague may accompany for support.

The Company will do what it can to minimise any difficulties that a stakeholder may experience as a result of raising a concern. For instance, if asked to give evidence in criminal or disciplinary proceedings, the Company will arrange for appropriate advice and support.

Escalation

This policy is intended to provide an avenue to raise a concern to the Company and for that concern to be investigated by the Company with a view to a satisfactory remedy being provided to that concern. However, if the remedy provided is deemed as unsatisfactory by the stakeholder, the individual or group can escalate the concern to the Company's Accrediting body, the ICoCA, and/or industry association as required. Contact details of which will be provided in those circumstances.

Information regarding the concern is deemed confidential to the Company or associated stakeholder and is not to be shared with any unrelated person or entity.

This policy **does not** prejudice the stakeholder from taking independent legal advice.

Recording and Monitoring

The head of compliance will maintain a register of all concerns raised. All Company officer assigned to engage with the concern must ensure the head of compliance is updated in real time with any information required for the register.

The head of compliance will review the register and produce an annual report to the board of directors and shareholders, which will include a summary of the concerns raised and actions taken to remedy inc. any lessons learned.

The register together with annual reports will be available for inspection through by internal and external audit.



Harry Hayes
Chief Operating Officer

Sangfroid Group Ltd
1st November 2022

