

1 WHISTLE BLOWING POLICY

1.1 Policy

The Company's policy applies in the following circumstances:

- You should use this policy if you wish to raise concerns about wrongdoing of the
 nature listed below. If you are an employee and would also like us to deal with the
 matter as a formal grievance, for example because it affects you personally, you
 should tell us.
- If you have a concern relating to one of the areas listed below, the matter can be reported in the manner set out in this policy without fear of reprisals.
- The purpose of this policy is to enable us to investigate and deal properly and sensitively with any such allegations of wrongdoing, which you raise.
- We will not tolerate wrongdoing by workers at any level.

1.2 Types of wrongdoing addressed by this policy

If you genuinely believe that we, or any of our workers, has taken, is intending or has failed to take action that you reasonably believe will lead or amount to:

- a criminal offence;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- damage to the environment; or
- the deliberate concealment of information tending to show any of the matters listed above

You can disclose this information verbally or in writing to a Director. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

1.3 Investigating allegations of wrongdoing

If you disclose information in accordance with this policy, wherever reasonably practicable we will keep your identity confidential.

We will investigate your allegation promptly. During the course of our investigation we may require your assistance. We discourage anonymous disclosures, as they are likely to hinder effective investigation.

We will inform you of the outcome of the investigation as soon as practicable. We will take whatever action we consider to be appropriate.



1.4 Action we may take

If you reasonably believe that the nature of your concern relates to any of the areas set out above and you disclose this information to the appropriate person under this policy in good faith, no action will be taken against you for making the disclosure.

We will, however, take appropriate action against any person found to be:

- victimising another person for using this policy
- deterring any person from reporting genuine concerns under this policy
- making a disclosure/allegation maliciously, in bad faith or with a view to personal gain.

For employees, action may be taken under our Disciplinary Procedure.

K. Rowland Finance Director

Last update: 19 May 2017