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Creation Date	-
Document Owner	Chief Executive Officer
Review Period	24 Months
Next Review	May 2026



Whistle Blowing Policy

Gilbert Gilkes & Gordon Ltd.

We are committed to conducting business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

The Public Interest Disclosure Act 1998 gives protection to individuals, employees, directors, consultants, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

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.

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 within this policy without fear of reprisals.

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
- financial mismanagement or corruption
- a miscarriage of justice
- instances of modern slavery or human trafficking
- danger to the health and safety of any individual
- damage to the environment
- 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. However, where you prefer not to raise it with a Director for any reason, you should contact the Head of Human Resources. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

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. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent 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.

Alerting outside bodies to a suspected wrongdoing

An individual should always, in the first instance, talk to a manager or director in the organisation about a suspected wrongdoing. If the individual is not satisfied with the response, s/he is entitled to contact a relevant external body to express their concerns. In doing this the individual should:

- Ensure that the allegation is based on correct facts
- Make the disclosure to a relevant body
- Have a reasonable belief it is in the public interest to make the disclosure.

A “relevant body” is likely to be a regulatory body (e.g. the Health and Safety Executive).

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.

This policy was approved by the Board of Directors of Gilbert Gilkes & Gordon Ltd on Fri 24 May 2024.



Andy Poole MBA
Chief Executive Officer

24 May 2024