

Public Interest Disclosure Policy & Procedure

UNI-POLS-32 | Revision 2 | 29 June 2020

Purpose

This policy and the associated procedure are designed to clarify and provide guidance on raising matters of concern with the Company. The policy will hold the standards, laws and guidelines whilst the procedure will describe the tasks and actions required. A summary of areas covered by this policy is detailed below. Should you have any questions in relation to this document please speak to your Line Manager:

- General principles of the Policy and Procedure
- The public interest disclosure procedure

General Principles

It is the Company's approach that:

- The Company conducts its business with the highest standards of integrity and honesty and expects all employees to maintain the same standards in everything they do
- Employees are encouraged to report any wrongdoing by the Company or any other employees that falls short of these business principles
- The Company is keen to hear of any concerns that employees may have about wrongdoing at work and encourage employees to use the procedure prescribed below wherever possible
- The Company recognises that employees may not always feel comfortable about discussing their concerns internally especially if they believe that the Company is responsible for the wrongdoing
- The Company engages an external organisation to manage confidentially all whistleblowing matters that are raised through its dedicated platform

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THE PUBLIC INTEREST DISCLOSURE PROCEDURE

The Company will follow the procedure below as far as is reasonably practicable if an employee has a reasonable belief about any concerns relating to wrongdoing at work which are in the public interest, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these. The Public Interest Disclosure (sometimes known as whistleblowing) has two levels to the procedure as follows:

Manager Level

If appropriate, the employee should discuss the matter with their manager in the first instance.

An approach by an employee to their manager will be treated as confidential and will not result in any report to anyone within the business unless there is a health and safety risk to other employees or a criminal offence is involved.

If the matter requires further investigation it will be carried out and the employee will be informed of the outcome and what, if any, action has been taken.

Director Level

If the employee remains unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, the employee should refer the matter to a Director. When the Director has investigated the complaint, they will inform the employee of the result of the investigation and what, if any, action has been taken.

Protection from Detriment

The Company confirms that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47B of the Employment Rights Act 1996. In the event that an employee believes they are being subjected to a detriment by any person within the business as a result of their decision to invoke the procedure the employee must inform a Director immediately and appropriate action will be taken to protect from any reprisals.

If it should become clear that the procedure has not been invoked by a reasonable belief that the disclosure is in the public interest, for example personal matters such as an employee claiming their contract of employment had been breached as they had not been provided with the correct personal protective equipment required to perform their role or they had received an incorrect amount of holiday pay, this will be dealt with in accordance with the terms of the Grievance Procedure.

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Dealings with External Bodies

The Company recognises there may be matters that cannot be dealt with internally and external bodies will need to become involved. Where the employee reasonably believes that the appropriate action has not been taken, they should report the matter using the confidential platform made available for this purpose. In addition, there are a number of bodies to which qualifying disclosures may be made, including HM Revenue & Customs, the Health and Safety Executive and the Environment Agency.

Further Information

The Company will review policies and procedures periodically to reflect changes in legislation, good practice etc.