

Author: Head of HR Partnering. **Approved by:** Chief HR Officer

Statement and purpose

Workdry is committed to creating a “speak-up” culture where concerns can be raised openly and safely. This reflects our values of trust, respect, collaboration, and looking out for one another’s safety and wellbeing.

This policy enables individuals to raise concerns about suspected wrongdoing, unethical behaviour or breaches of legal obligations in confidence, so that issues can be identified and addressed promptly. This includes concerns relating to modern slavery, forced labour, human trafficking, child labour and labour exploitation within our own operations or supply chain.

This policy supports compliance with the Public Interest Disclosure Act 1998 (PIDA) and provides protection for individuals who make a protected disclosure.

This policy does not form part of your contract of employment and may be updated at any time.

Scope

This policy applies to:

- All UK employees of Workdry International, Selwood Ltd and Siltbuster Ltd
- Workers, contractors, agency staff, consultants and associated persons
- Any third party interacting with the business (e.g. suppliers, customers, contractors and service providers), including where concerns relate to modern slavery or unethical labour practices
- Concerns raised in the UK and overseas, including within our operations and supply chain

Personal employment concerns should be raised under the Grievance Policy, unless they meet the definition of a protected disclosure.

What is Whistleblowing

Whistleblowing is the disclosure of information where an individual reasonably believes that wrongdoing has occurred, is occurring, or is likely to occur, and that it is in the public interest.

A disclosure is considered to be in the public interest where it affects others beyond the individual, such as colleagues, customers, the public, the environment, or the organisation as a whole.

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This includes (but is not limited to):

- Criminal offences
- Failure to comply with a legal obligation
- Miscarriages of justice
- Risks to health and safety
- Environmental damage
- Modern slavery, including forced labour, human trafficking, child labour and labour exploitation
- Harassment, bullying or sexual harassment
- Deliberate concealment of any of the above

Protection for Whistleblowers

Individuals who make a disclosure in the public interest and with a reasonable belief that wrongdoing has occurred, is occurring, or is likely to occur, will be protected under this policy.

They will not be subjected to any detriment because they have made a disclosure.

Any form of retaliation will be treated as a disciplinary offence.

No action will be taken against an individual who raises a concern in good faith, even if it is not subsequently upheld. Deliberately false or malicious allegations may result in disciplinary action.

Confidentiality and anonymity

All concerns will be handled confidentially where possible.

- Identity will not be disclosed without consent unless legally required
- Anonymous disclosures are accepted, but may limit investigation and feedback

We encourage individuals to provide contact details to enable a more effective investigation.

How to Raise a Concern

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Individuals are encouraged, but not required, to raise concerns internally in the first instance. Concerns can be raised through any of the following routes:

Line Manager Route

In most cases, concerns should be raised with your line manager, who will take appropriate action or escalate where required.

Alternative Internal Contact Route

If raising the concern with your line manager is not appropriate, you can raise this with:

- A Director, or
- A member of the HR team via HR@Workdry.com

How to raise a concern

Concerns can be raised:

- Verbally (in person or by phone), or
- In writing (including email or letter)

A concern raised verbally will be treated in the same way as one raised in writing.

Where a concern is raised verbally, the manager or recipient will make a written record to ensure it has been understood fully, be appropriately reviewed and investigated.

What to include when raising a concern

Where possible, individuals should provide:

- A clear description of the concern
- Names of individuals involved (if known)
- Any supporting information or evidence

It is not necessary to have proof. A reasonable belief is sufficient.

External Disclosure

Individuals may raise concerns externally with a relevant prescribed body (such as a regulator) where appropriate.

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Prescribed bodies include organisations such as the Health and Safety Executive (HSE), Environment Agency, Financial Conduct Authority (FCA), and HM Revenue & Customs (HMRC).

A list of prescribed bodies is available here:

[Whistleblowing: List of prescribed people and bodies](#)

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What Happens Next?

All concerns will be taken seriously and assessed promptly.

Where appropriate:

- An investigator will be appointed
- Further information may be requested
- Meetings may be arranged to clarify the concern

Individuals may be accompanied by a colleague or trade union representative where a meeting is required.

Investigations will be proportionate to the nature of the concern.

Where possible, feedback will be provided. In some cases, this may be limited due to confidentiality or data protection requirements.

Escalation

If an individual believes that:

- their concern has not been appropriately addressed, or
- the investigation has not been handled appropriately

They may raise the concern again through an alternative route outlined above.

Training

All employees working for the organisation are required to complete appropriate training regarding Whistleblowing on the company's learning management system. Whistleblowing

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eLearning modules are assigned to all new employees and re-assigned across the whole workforce on an annual basis.