

Whistleblowing Policy and Procedure

Statement and purpose

The purpose of this policy is to ensure that that everyone in the organisation is aware of and understands:

- **The importance of preventing eliminating any fraud, misconduct, or wrongdoing at work.** Everyone should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of and should raise any legitimate concerns under this policy and procedure in the first instance;
- **How to raise a legitimate concern about specific matters;**
- **That it is the organisation's responsibility to ensure that an investigation takes place** - the employee or worker has no responsibility for investigating the matter;
- **Any matter raised under this policy and procedure will be investigated thoroughly, promptly, and confidentially by the organisation**, and the outcome of any investigation will be reported back to the employee or worker who raised the issue;
- **That no employee or worker will be victimised by anyone else** in the organisation for raising a matter under the procedure with this policy;
- **That the law (Public Interest Disclosure Act 1998) provides protection for employees and workers who raise legitimate concerns about specific matters.**

Scope

This policy and procedure applies to all employees of Selwood Ltd, Siltbuster Ltd and Workdry International, and to workers and temporary workers of the organisation. It is for disclosures about matters other than a breach of an employee's own contract of employment or personal grievances. Personal grievances are not covered by whistleblowing law unless a specific matter is in the public interest. If an employee wishes to raise a personal grievance or is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's grievance procedure.

The organisation also encourages other individuals who perform functions in relation to its business activities to use this policy and procedure to make a protected disclosure about the organisation, where it may be in the public's interest to disclose a legitimate concern. These parties may include consultants, contractors, agents, partners, and subsidiaries acting for, or on behalf of, Workdry International Ltd ("associated persons") within the UK and overseas.

Definitions

A **whistle-blower** is an employee or worker (or other individual) who reports a certain type of legitimate wrongdoing that they have seen at work which is in the public interest.

A **qualifying disclosure / legitimate concern** is one made in the public interest by an individual who has a reasonable belief that one of the following is being, has been, or is likely to be committed:

Whistleblowing Policy and Procedure

- a criminal offence, for example fraud;
- a miscarriage of justice;
- an act creating risk to health and safety e.g., someone's health and safety is in danger;
- an act causing damage to the environment;
- the organisation is breaking the law; or
- concealment of any of the above i.e., the belief that someone is covering up wrongdoing;

The above list is not exhaustive list of examples of a qualifying disclosure. It is also not necessary for an individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient, provided that it is a legitimate concern.

Employment

- An employee or worker who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure;
- Victimisation of an employee or worker for raising a qualified disclosure will be a disciplinary offence;
- Continued employment and opportunities for future promotion or training of the employee or worker will not be prejudiced because they have raised a legitimate concern;
- If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures;
- Maliciously making a false allegation is a disciplinary offence;
- An instruction to cover up wrongdoing is itself a disciplinary offence. If an individual is told not to raise or pursue any legitimate concern, even by a person in authority such as a manager or senior leader, employees and workers should not agree to remain silent. They should report the matter to the HR department.

Procedure

For employees and workers

1. **Any legitimate concerns should be raised with the individual's line manager in the first instance.**

If the individual is not sure whether or not to raise a concern, they should discuss the issue with their line manager.

If the individual reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the individual does not wish to approach their line manager, they should in the first instance contact a director of the organisation or the HR department (HR@selwood.co.uk for

Whistleblowing Policy and Procedure

Selwood Ltd/Workdry International or HR@siltbuster.com for Siltbuster Ltd). Any approach will be treated with the strictest confidence and the individual's identity will not be disclosed without their prior consent.

- The line manager will arrange an investigation into the matter** (either by investigating the matter personally or immediately passing the issue to HR, SHEQ or someone in a more senior position).

The investigation may involve the individual raising the concern (and any other individuals involved in giving a written statement). The individual's statement will be considered, and they will be asked to comment on any additional evidence obtained.

If the concerns raised are proven to be well founded, the line manager (or the person who carried out the investigation) should report this to senior leadership, who will then take responsibility for taking the appropriate action, including reporting the matter to any appropriate government department or regulatory agency.

If the individual raising a concern believes that their line manager or person investigating the matter has failed to make a proper investigation or has failed to report the outcome of the investigations to senior leadership, they should inform a director of the organisation or the HR department.

If disciplinary action is required against an employee or worker alleged to have committed any wrongdoing, the line manager (or the person who carried out the investigation) will report the matter to the HR department and start the disciplinary procedure.

- On conclusion of any investigation, the individual will be told the outcome of the investigation** and what management/senior leadership has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

If on conclusion of stages 1, 2 and 3 the individual raising a concern reasonably believes that the appropriate action has not been taken, they should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- the Financial Conduct Authority;
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

Whistleblowing Policy and Procedure

A list of prescribed people and bodies with contact detail can be found on the GOV.uk website: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>.

No individual must contact the media to raise a concern. The media is not a relevant external body.

For third parties

Any legitimate concerns should be raised to HR@selwood.co.uk (for Selwood Ltd/Workdry International) or HR@siltbuster.com (for Siltbuster Ltd) in the first instance. The concern will be reported to senior leadership, who will then take responsibility for investigating the matter and taking the appropriate action, including reporting the matter to any appropriate government department or regulatory agency. On conclusion of any investigation, the individual will be told the outcome of the investigation.

Responsibility and review

The **Workdry Board of Executive Directors** has general responsibility and oversight to ensure that this policy and its implementation complies with ethical obligations. This Policy replaces GP/HR/35 issue 2, Apr 2022 and has been reviewed and approved by the Workdry Board of Executive Directors. This policy will be reviewed and evaluated for reasons including, but not necessarily limited to, a scheduled periodical review, a change in legislation or recommended codes of practice, or an identified problem or issue.

Company Leadership and Management Teams have ultimate responsibility for and ensuring employees, workers and associated persons are aware of this policy and procedure through new starter inductions, refresher training and ongoing communication on this subject matter.

Any manager who is contacted by an employee, worker or associated person about a legitimate concern should take appropriate action without delay. The manager should explain to the individual raising the concern what action they propose to take and the likely timescales for those actions to be completed. If concerned they should seek advice and guidance from HR, SHEQ or external body, as relevant to the nature of the disclosure. The manager should act with care and discretion. Action should not be taken which might encourage the removal, destruction, or concealment of relevant information.

No manager should subject an employee or worker to any detrimental treatment because that individual has raised a legitimate concern or disclosure. This applies even if the disclosure turns out to be groundless.

The Safety, Health, Environmental and Quality (SHEQ) department will be responsible for supporting any concerns raised with advice and guidance in relation to SHEQ matters, and leading

Whistleblowing Policy and Procedure

or supporting investigations in conjunction with the relevant manager or member of the leadership team, if required.

The **HR department** is responsible for supporting any concerns raised with advice and guidance and supporting any investigations in conjunction with the relevant manager or member of the leadership team, if required. It is also responsible for making available suitable eLearning to employees and workers about Whistleblowing.

Employees and workers; if an individual has a legitimate concern about anything that is happening in the organisation and they reasonably believe that their disclosure is made in the public interest they should, in the first instance, report this to their line manager. If it would be inappropriate to report the matter to their line manager, they should contact any manager with whom they feel comfortable discussing the issue or the HR department.

Training

All employees working for the organisation are required to complete appropriate training on about Whistleblowing. This is normally delivered via internal e-learning (pending a new Learning Management System being implemented 2023).

This document becomes uncontrolled on printing. Please ensure you are using the most current version by checking on SharePoint.