

# Whistleblowing Policy – Finnebrogue Group

## Introduction

The purpose of this policy is to encourage employees and others who have serious concerns about any aspect of the company's work to come forward and voice those concerns.

Whistleblowing allows an employee to make a disclosure of information to the employer or a relevant party where they suspect or know the company is responsible for some wrongdoing. The employee is protected against dismissal or detriment by The Public Interest Disclosure Order 1998.

## Definitions

- **Whistleblowing:** the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrong doing
- **Qualifying disclosure:** a disclosure of information that the employee genuinely and reasonably believes in the public interest and shows that the Company has committed a "relevant failure".

**Eligibility:** This policy will apply to all employees.

## Responsibilities

- **Human Resources:** HR is responsible for administering and monitoring this policy. They are also responsible for ensuring all employees are aware of the whistleblowing procedures in place through the induction process, regular briefing notes, and open communication with employees.
- **Directors:** Directors are responsible for supporting and ensuring their employees comply with this policy.
- **Line Managers:** Managers are responsible for ensuring all employees are aware of the whistleblowing procedure and supporting HR in the communication with employees.
- **Employees:** All employees are subject to this policy. All employees are responsible for ensuring they comply with the requirements of the policy and specifically to participate in a professional, consistent and equitable manner at all times.

## 1. How it works

In this policy 'whistleblowing' means the reporting of information to the employer or the relevant authority by an individual who knows, or suspects, that the company is responsible for taking part in some wrongdoing.

If you make a whistleblowing allegation that is in the public interest, the law will protect you against victimisation. This protection applies to anyone who makes a 'qualifying disclosure'. A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a "relevant failure" by:

- Criminal activity

- Failure to comply with any legal or professional obligation or regulatory requirements
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

Employees must reasonably believe that the disclosure is “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Company’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

Employees are often the first to realise that there may be something seriously wrong within the company. ‘Whistleblowing’ is viewed by the company as a positive act that can make a valuable contribution to the company’s efficiency and long-term success. It is not disloyal to colleagues or the company to speak up. The company is committed to achieving the highest possible standards of service and the highest possible ethical standards.

## **2. How to raise a concern**

In the first instance you should report any concerns you may have to your line manager or a representative from the HR team, where the concern relates to your line manager or it is not appropriate to make the report to your line manager. All concerns reported will be treated in the utmost confidence. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses. This meeting will be held within 5 working days following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

If the employee is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, employees may

raise a formal complaint under the Company's grievance policy. Alternatively, there are a number of channels which are available for employees which are anonymous:

- NAVEX: Dial 0-800-89-0011, then dial (833) 547-0149
- Asda Ethical Hotline: 0800 963 8442 / [ethics@asda.co.uk](mailto:ethics@asda.co.uk)
- SafeCall - 0800 915 1571 / [www.safecall.co.uk/coop](http://www.safecall.co.uk/coop)

### **3. Formal action**

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

### **4. Protection**

We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this procedure, even if they turn out to be mistaken.

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

### **5. Monitoring and Evaluation**

The operation of this policy will be monitored and a review conducted annually or upon an update. HR will be responsible for initiating the review.

Signed



**Andrew Nethercott**  
Chief Executive Officer