



WHISTLEBLOWING POLICY

1.1 Introduction

If employees or contractors have concerns about the business which relate to fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and/or breaches of legal or professional obligations, those concerns can be raised under this policy. The Company has introduced this policy and whistleblowing procedure to enable employees or contractors to raise such concerns at an early stage and in the right way, particularly where it may be felt that raising such issues may be felt to be disloyal to colleagues. This Whistleblowing Policy is for concerns which are in the public interest where the interests of others or of the organisation itself are at risk.

1.2 The Company's assurances to employees and contractors:

Safety

The Company is committed to this policy. If anyone raises a genuine concern under this policy, that individual will not be at risk of losing their position or suffering any form of retribution as a result. Provided individuals reasonably believe the concerns they are raising, it does not matter if they are mistaken.

Confidence

The Company will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, it is recognised that individuals may nonetheless want to raise a concern in confidence under this policy. If individuals ask for their identity to be protected, it will not be disclosed without consent. If the Company is not able to resolve the concern without revealing the relevant individual's identity (for instance because evidence is needed in court) the Company will discuss with the individual whether and how it can proceed.

In general however, it is difficult for the Company to properly investigate concerns raised anonymously.

1.3 Procedure

Once the Company has been notified of an issue arising under this policy, it will be investigated to assess what action should be taken. This may involve an internal inquiry or a more formal investigation. The Company will state who is handling the matter and whether further assistance may be needed. If requested, the Company will write to summarise the concern and setting out how it is proposed that it will be handled.

Individuals who raise a concern may be asked how they think the matter might best be resolved.

While the purpose of this policy is to enable the Company to investigate possible malpractice and take appropriate steps to deal with it, individuals who raise a concern, will be given as much feedback as possible in the circumstances.

If requested, the Company will confirm its response in writing. It may not be possible, however, to tell you the precise action taken where this would infringe a duty of confidence owed to someone else.

1.4 How to raise a concern

Step one

If an individual has a concern about malpractice, it should in the first instance be raised with the Company Secretary. This may be done orally or in writing. If unable to raise the matter with the Company Secretary, for whatever reason, it should be raised with the Senior Independent Director.

Please make it clear if it is to be raised in confidence.

Step two

If these channels have been followed and there are still concerns, or if it is felt that the matter is so serious it cannot be discussed with any of the above, please contact the Chairman.

1.5 Independent advice

If unsure whether to use this procedure or if you wish to have independent advice at any stage, contact the independent charity Public Concern at Work on 020 7404 6609. They can give free confidential advice at any stage about how to raise a concern about serious malpractice at work.

1.6 External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases individuals should not find it necessary to alert anyone externally.

It is recognised however that there may be circumstances where it may be appropriate to report matters to outside bodies, such as regulators or the police but we strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work will be able to advise on such options and on the circumstances in which employees may be able to contact an outside body safely.