

PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING) POLICY

1. POLICY STATEMENT

- 1.1 We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. We believe that a culture of openness and accountability across Hargreaves Services plc (the **Group**) is essential in order to prevent such situations occurring or to address them when they do occur.
- 1.2 The aims of this policy are:
- (a) To encourage staff to use this policy in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - (b) To provide staff with guidance as to how to raise those concerns.
 - (c) To reassure staff that they should be able to raise genuine concerns under this policy without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of our business, including senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff (collectively referred to as **staff** in this policy).

3. WHAT IS WHISTLEBLOWING?

- 3.1 **Whistleblowing** is the disclosure of information which relates to suspected serious wrongdoing or serious dangers at work. This may include:
- (a) criminal activity;
 - (b) miscarriages of justice;
 - (c) danger to health and safety;
 - (d) damage to the environment;
 - (e) failure to comply with any legal obligation, professional obligation or regulatory requirements;
 - (f) bribery;
 - (g) financial fraud or mismanagement;
 - (h) breach of our internal policies and procedures;
 - (i) conduct likely to damage our reputation;

- (j) unauthorised disclosure of confidential information; and
- (k) the deliberate cover-up of any of the above matters.

- 3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above, reasonably believing that one or more of the above has occurred or is likely to occur. If you have any genuine concerns relating to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.
- 3.3 This policy should not be used for complaints relating to your own personal circumstances, such as a general Health & Safety concern or the way you have been treated at work. In those cases you should use the Health & Safety concerns procedure or the Grievance Procedure.
- 3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

4. RAISING A WHISTLEBLOWING CONCERN

- 4.1 We hope that in many cases you will be able to raise general concerns with your line manager **OR** via a member of the Human Resource department. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.
- 4.2 Where you believe that the matter is serious and falls within the scope of this policy, or you feel that your line manager **OR** the HR function has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following via the contact details set out at the end of this policy:
- (a) the Whistleblowing Officer; or
 - (b) our confidential external hotline, operated by Safecall Limited.
- 4.3 We will arrange a meeting with you as soon as possible to discuss your issues. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 4.4 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. CONFIDENTIALITY AND ANONYMITY

- 5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every

effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

- 5.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.
- 5.3 Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contacts listed in paragraph 4 above and appropriate measures can then be taken to preserve confidentiality.
- 5.4 If you are in any doubt, you can seek advice from Safecall Limited or Protect (formerly Public Concern at Work), the independent whistleblowing charity, who offer a confidential helpline. Contact details for both are at the end of this policy.

6. THIRD PARTIES

- 6.1 Whistleblowing concerns are likely to relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager **OR** the Whistleblowing Officer for guidance.

7. EXTERNAL DISCLOSURES

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most instances, you should not need to alert anyone externally.

8. INVESTIGATION AND OUTCOME

- 8.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 8.2 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 8.3 In some cases, we may need to appoint an investigator or team of investigators including staff with relevant experience or specialist knowledge of the subject-matter to undertake an investigation. The investigator(s) may also make recommendations for change to enable us to minimise the risk of future wrongdoing.

- 8.4 We will promptly investigate all allegations and will take whatever action we consider appropriate. We will inform you of the outcome of the investigation as soon as practicable.
- 8.5 If you reasonably believe that the nature of your concern relates to any of the areas set out in paragraph 3.1 above and you disclose this information to the appropriate person under this policy no action will be taken against you for making this disclosure, provided there has not been the making of false allegations maliciously or with a view to personal gain.
- 8.6 We will take appropriate action against any staff member:
- a) found to be victimising another person for using this policy or deterring any person from reporting genuine concerns under it; or
 - b) making the disclosure/allegation maliciously, or vexatiously, or with a view to personal gain, or where there were no reasonable grounds for believing that the information supplied was accurate.
- 8.7 If any such person is employed directly by this organisation they will be subject to disciplinary action, which may result in dismissal.

9. IF YOU ARE NOT SATISFIED

- 9.1 While we cannot always guarantee the outcome you might seek, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this aim.
- 9.2 If you are not happy with the way in which your concern has been handled, you can raise it with the Whistleblowing Officer.

10. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 10.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 10.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

A confidential hotline is available to whistleblowers who raise concerns under this policy. All staff can access the Group's whistleblowing hotline, operated by Safecall Limited. Contact details are set out at the end of this policy.

11. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

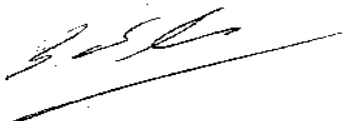
- 11.1 The Board of Directors (**Board**) have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 11.2 The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 11.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.
- 11.4 The Whistleblowing Officer, in conjunction with the Board, should review this policy from a legal and operational perspective at least once a year.

12. CONTACTS

Whistleblowing Officer	Group Legal Counsel 0191 373 4485
Whistleblowing Hotline Operated by Safecall Limited	0800 915 1571 – UK 00 800 7233 2255 – Germany 3077 5524 – Hong Kong 0800 990 243 – South Africa
Protect (formerly Public Concern at Work)	https://protect-advice.org.uk/ 020 3117 2520



Roger McDowell
Chair



Gordon Banham
Group Chief Executive