

Whistle Blowing Policy

Public Interest Disclosure 'Whistle-blowing'

We operate a strict policy in relation to wrongdoing (which will be regarded as a disciplinary offence) and will not tolerate actions which may amount to a criminal offence or breaches of legal obligation, a miscarriage of justice, danger to health or safety or which may damage the environment ("wrong doing"). All employees are expected to maintain the highest of standards of integrity and good faith. Under Part IVA of the Employment Rights Act 1996 employees who report wrong doings to certain parties are protected. However, it is our policy that any wrongdoing that has occurred should be reported to us. Accordingly, we have devised the following policy in order to encourage you to report any matters that you believe are of concern to our business and to reassure you that you will be protected in respect of any such disclosure.

You may be concerned about the repercussions to you in reporting matters that are of concern. We assure you that you will be protected and will not be subjected to any detriment because you have reported a matter that you believe in good faith to amount to wrongdoing or potential wrongdoing.

However, you must note that if you make any allegation which you do not believe or which is made maliciously or for some ulterior motive (i.e. a grudge against a fellow worker) then this may be treated as a disciplinary matter and we may invoke the disciplinary procedure.

Reporting Wrongdoing

In the first instance you may wish to raise the matter with your Supervisor on an informal basis and discuss with him or her steps should be taken to report the matter to more senior management.

You may at any time raise the matter formally with your Supervisor, whether orally or in writing and he or she will pass on the matter to the appropriate level of Management.

If your concern is about your Supervisor or someone at a higher level of management then you should feel free to raise the matter with whatever you consider to be the appropriate level of management.

At all stages, all statements that you make will remain confidential unless you express a contrary wish or it becomes necessary to divulge such statements during the course of an investigation.

Investigations

You must recognise that a complaint about wrongdoing may lead to us wishing to carry out an investigation into the allegations of wrongdoing. In these circumstances you will be informed before any of the matters that you have raised are put to the alleged wrongdoer and you will be protected by your employer who will ensure that your work environment is not affected because you disclosed the matter to us.

You will be informed of the outcome of any investigation and what action has been taken.

If you have any concern or complaint about the manner in which you feel you are being treated because you made the disclosure, whether by the alleged wrongdoer or any co-employees you should raise this with whatever level of management you consider to be appropriate and this may be dealt with as a disciplinary matter in relation to such individuals.

If you are unhappy about the manner in which your disclosure was treated by the person to whom it was reported, or you consider that it has not been properly investigated then you should report the matter to whatever level of management you consider appropriate which may include a Director of the Board of Directors. You will not suffer any detriment by making such a report unless point 2 above applies.

At all times our intention will be to resolve the allegations that have been made and to ensure that wrongdoing has not occurred or, if it has occurred it is dealt with appropriately. However, we will not hesitate to report wrongdoing to the appropriate body if we consider that this is the correct approach to adopt in the circumstances.