

J. Freeley Ltd

Whistleblowing Policy

Trust and integrity are vital to The Company. However, the company recognises that misconduct and malpractice may occur from time to time.

This policy and procedures allow employees to express their concerns about any such misconduct or malpractice without fear of reprisal. The company is keen to be informed of those concerns and will deal with them by following a procedure to investigate situations. The company believes that this will encourage a culture of openness and that all employees will be able to act responsibly in order to uphold the reputation of the company.

Misconduct / Malpractice

The company wants employees to raise concerns about any actual or planned (whether in the past, present or future) misconduct or malpractice. This is called making a disclosure. In particular, the company wants to hear about:

- Fraud or financial irregularity.
- Corruption, bribery or blackmail.
- Criminal offences.
- Failure to comply with a legal or regulatory obligation.
- Miscarriage of justice.
- Endangering the health or safety of any individual.
- Endangering the environment.
- Improper conduct or unethical behaviour.
- Concealment of any of the above.

If employees want to raise a concern about any of the above, they should use the procedure set out below.

(Please note that there are existing procedures to enable an employee to raise grievances concerning their own employment).

Procedure

How to raise a concern

- If an employee has a concern, they should act promptly. The sooner it is raised, the sooner it can be dealt with.
- Employees should contact one of the "Designated Officers". They are listed here:
 - Managing Director
 - Finance Director
 - HR Manager or equivalent for each business unit.
- If possible, employees should raise concerns in writing. However, if they cannot do so, then any disclosures can be made verbally. They should provide as much supporting evidence as possible.
- Employees will be offered an interview in which their concern(s) will be discussed. A work colleague or trade union official may accompany employees at that interview.

What the company will do

After the concern has been raised, the Designated Officer will consider what steps should be taken next. Such steps can include one or more of the following:

- Reporting the matter to the police.
- An internal investigation by the company and/or by external investigators appointed by the company.
- Making the Grievance Procedure available or invoking the Disciplinary Procedure.
- Reporting the matter to the appropriate people that there are no further actions.

Once a decision has been made as to what step(s) need to be taken, employees will be informed accordingly. If no further steps are proposed, employees will be given reasons for this in writing.

The identity of employees will be kept confidential as far as is practicable throughout this procedure.

However, in some circumstances, it may be possible for others to deduce identity from the action taken by the company to investigate, or to remedy, the misconduct/malpractice.

Concerns expressed anonymously will only be considered if the company decides to

do so because of:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

All anonymous allegations will be passed to the Managing Director, in consultation with others as appropriate.


External Disclosure

If employees are not satisfied with the decision of the Designated Officer and any further step(s) (if any) taken or their outcome, then they may raise their concerns on a confidential basis with the police, a member of parliament or an appropriate public authority. Before taking any such action, they should first inform the Designated Officer.

Protection

The company will not (and will use reasonable endeavours to ensure that its employees do not) subject employees to any detriment as a result of a disclosure that is made in good faith. Any such treatment should be immediately reported to the Designated Officer.

Employees will not be subjected to any disciplinary action as a result of making a disclosure in good faith in accordance with this procedure. However, if the company believes that the disclosure has been made maliciously, vexatiously, for personal gain or where an external disclosure is made when not "protected" by the provisions of the Public Interest Disclosure Act 1998, and in accordance with this procedure, then the company may bring disciplinary action against the employee.



Signed:

(Director)

Printed:

John Freeley

(Director)

Dated: 01 June 2023

Review Date 01 June 2024