Whistleblowing Policy

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1. Purpose:

Unyte Group strives at all times to conduct its business with the highest standards of integrity and honesty. It expects all staff members to maintain the same standards in everything they do.

All team members are therefore encouraged to report any wrongdoing by the Company or its staff members that falls short of these business principles.

The Public Interest Disclosure Act 1998 protects any staff members who report wrongdoing within the workplace, but it is the aim of this Policy to ensure that as far as possible all staff members are able to report any wrongdoing at work which they believe has occurred, is occurring or is likely to occur in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them as an individual who has raised such a concern.

These legitimate concerns about specified matters are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by a team member who has a reasonable belief that;

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- A breach of any other legal obligation
- An act causing radicalisation or extremism
- Concealment of any of the above is being, has been, or is likely to be, committed; a reasonable belief is sufficient. is being, has been, or is likely to be, committed. It is not necessary for the reporting individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.

The staff member has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

2. Principles:

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff members should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the staff member who raised the issue.

No staff member will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the team member will not be prejudiced because they have raised a legitimate concern.

Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence. If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.

Maliciously making a false allegation is a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to a director.

3. Procedure:

All staff members are encouraged to use the procedure set out below if they have any concerns at all about wrongdoing at work as set out in the principles of this policy. Allegations made against team members will be managed and investigated in accordance with company policies and procedures, including the Disciplinary policy.

3.1. In the first instance any concerns should be raised with the staff member's own Line Manager. If the individual believes the Line Manager to be involved or for any reasons does not wish to

approach their Line Manager the staff member should contact their next level of Line Management in the first instance.

3.2. If the matter requires further investigation, such an investigation will be carried out and the staff member will be informed of the outcome and what, if any, action has been taken. If the staff member remains unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, they should refer the matter to the Group CEO. When the complaint has been investigated, they will be informed of the result and what, if any, action has been taken.

If the staff member is concerned that their line manager, investigating manager or Director is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations, they should inform Group CEO who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report.

3.3. If on conclusion of stages 1 and 2 the staff member reasonably believes that the appropriate action has not been taken, they should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- Financial Conduct Authority (formerly the Financial Services Authority);
- Competition and Markets Authority;
- Health and Safety Executive;
- Environment Agency;
- the Independent Office for Police Conduct; and The Serious Fraud Office.

If it should become clear that the procedure has not been invoked in the public interest, for example for malicious reasons or to pursue a personal grudge against another team member, this will constitute misconduct and will be dealt with in accordance with the terms of the Company's Disciplinary Procedure.

In the event that a staff member believes they are being subjected to a detriment by any person within the Company as a result of a decision to invoke the procedure, they must inform their department Director immediately and appropriate action will be taken to protect them from any reprisals.

4. Data protection:

When an individual makes a disclosure, the organisation will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

5. References and further reading:

Public Interest Disclosure Act 1998 (legislation.gov.uk)

Data protection: The Data Protection Act - GOV.UK (www.gov.uk)

Whistleblowing for employees: What is a whistleblower - GOV.UK (www.gov.uk)