

Policy Statement

Whistleblowing

(Making a Disclosure in the Public Interest)

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include;

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of the above

Mick George Ltd (MGL) is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and others to raise concerns in a responsible and effective manner.

It is a fundamental term of every contract of employment that an employee will not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within MGL then this information should be disclosed internally without fear of reprisal. In the first instance those raising a concern should initially report to their line manager, if the issue relates to their line manager the HR manager should be informed.

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Where a concern is raised, we will investigate to determine initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who is handling the matter, how you can contact him/her and whether your further assistance may be needed.

Where an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

All disclosures will be treated in a confidential manner. The identity of the individual making the disclosure will be kept confidential and will not be disclosed without their consent for as long as possible provided it is compatible with an effective investigation. However, it may be necessary to reveal the source of the information in certain instances and, if so, this would never be done without the individual's prior knowledge.

Although we would hope this policy gives you the reassurance to report any concerns you may have through the internal channels we recognise that there may be circumstances where you feel unable to follow this process and want external advice and support.

If you are not satisfied with the outcome of the investigation, MGL recognises that employees have a right to make a disclosure about certain matters of concern relating to the matters set out above to prescribed persons, relevant professional bodies or regulatory organisations, for example;

- Business, finance or fraud - The Audit Commission
- Data Protection and Freedom of Information - The Office of the Information Commissioner
- Environment and Pollution - The Environment Agency
- Health and Safety – The Health & Safety Executive
- Police and justice - National Crime Agency

Alternatively, you may wish to discuss your concerns, in confidence, with Public Concern at Work which is an independent body that seeks to ensure that concerns about malpractice are properly raised and addressed in the workplace.

This policy will be made available to our employees, those working for or on behalf of MGL and provided on request to any other interested parties. The policy will be reviewed annually, subject to changes in company procedure or legislation.

Signed:

Managing Director

Date: January 2018