



Whistleblowing Policy

This policy applies to all companies within the Relyon Group.

The Company is committed to being open, honest and accountable. In line with that commitment the Company encourage employees and others with serious concerns about any aspect of the Company's work to come forward and raise those concerns.

This policy aims to encourage all staff to raise any serious concerns they may have about colleagues or their employer with confidence, at the earliest opportunity and without fear of resultant detriment or disadvantage.

This policy is written in the context of the Public Interest Disclosure Act 1998 which provides additional protection to workers who "blow the whistle" about specific forms of malpractice and wrongdoing within their organisation.

This policy will normally not deal with matters which concerns a complaint by an employee about action which the Company has taken or is contemplating taking in relation to them or their position. In such circumstances the Employee concerned should utilise the Company Grievance Procedure.

Qualifying Disclosure

The company encourages any worker to come forward with any information which the worker reasonably believes tends to show any;

- criminal offence or activity
- failure to comply with a legal obligation
- miscarriage of justice
- action or inaction which could endanger an individual's health and safety
- damage to the environment
- attempt to deliberately conceal any of the above

The matter should be raised whether it is has happened, is continuing to happen, or is likely to take place in the future.

Internal Process

Stage One

Employees should in the first instance approach their line manager informally if they have any concerns about any potential malpractice within the organisation.

The manager will make every reasonable attempt to adequately resolve any issue without unreasonable delay.

If at anytime it becomes clear that the allegation requires further investigation the manger may pass the details on a more senior manager. Any such referral will be discussed with the reporting employee beforehand.

Stage Two

If given the circumstances it would be inappropriate to raise the concern with their line manager, or if the seriousness and sensitivity of the matter require it, Employees may raise their concerns directly with a more senior manager.

The employee should specify if they wish for the mater to be dealt with in confidence so that appropriate arrangements can be made.

The Employee may be asked to set out their concerns in their writing detailing the basis for their belief and what resolution is sought.

The way in which the matter is dealt with will depend greatly on the nature and scope of the allegation. However once the matter has been passed to a senior manager they will commence a full investigation.

The senior manager will insure where possible the reporting employee is informed of the progress, outcome and any action taken as a result of the investigation (subject to legal constraint).

All matters raised will be dealt with without unreasonable delay.

Stage Three

Where, following stage one and two a satisfactory outcome within a reasonable timescale has not been reached, the reporting Employee may refer the matter to an appropriate individual of higher authority for investigation and resolution.

Protection

Disclosure to the Company will be protected, provided that it is made in good faith and the reporting Employee has a reasonable belief that the alleged malpractice has occurred, is occurring, or is likely to occur.

The Company recognises the decision to make a disclosure maybe a difficult one for an Employee as such where a disclosure is made in good faith the Company will take all appropriate action to protect a reporting Employee from being placed at any detriment or disadvantage as a consequence.

Further the Company will not tolerate any harassment or victimisation against a reporting Employee and will take any reasonable action to protect the Employee.

Any protected disclosure made will be treated confidentially; the details of the reporting Employee will not be revealed unless the company is under legal obligation to do so. However, there may be circumstances as where action may not be taken without the source of the information being revealed. In such circumstances matters will be discussed with the reporting Employee in advance.

False or Untrue Disclosure

Should an Employee make a disclosure in good faith then the above protections will apply whether the investigation supports the claim or not.

Should it become apparent that any disclosure raised was not made in good faith, was vexatious, malicious, made for personal gain or made with the intention of bringing an individual or the Company in to disrepute, disciplinary action may be taken against the Employee.



