

## Whistleblowing Policy

### Summary

In the Company we are committed to conducting our business with honesty and integrity and we expect all of our staff to maintain high standards. We encourage staff to report suspected wrongdoing as soon as possible, and this policy helps you to understand how to do so.

This policy applies to all individuals working at all levels and locations in the Company including Senior Managers, Directors and employees whether permanent, fixed-term or temporary. It also covers consultants and contractors wherever located, as well as any other third parties.

### What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes:

- Bribery;
- Fraud or other criminal activity;
- Miscarriages of justice;
- Health and safety risks;
- Damage to the environment;
- Information tending to show any matter falling within any of the above categories has been, is being, or is likely to be deliberately concealed; and
- Any breach of legal or professional obligations.

### How Can I Raise a Concern?

- We hope that in many cases, you will feel able to raise any concerns with your Reporting or Office Manager. However, where you prefer not to raise it with your Reporting or Office Manager for any reason, you should contact the Managing Director. Contact details are at the end of this policy.
- We will arrange a meeting with you as soon as possible to discuss your concern, at a location away from the office or on site if you are comfortable with that.
- You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

### Your Privacy Matters

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### External Disclosure?

- The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.
- Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### We Will Protect You

We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

In order to support you, the following conditions apply:

- Staff must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

### Key Contacts

Whistleblowing Officer	Andrew Hubbard – Managing Director 01432 347700
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: <a href="http://protect-advice.org.uk">protect-advice.org.uk</a>

Signed.......... Date..... 24<sup>th</sup> June 2024  
(reviewed annually).....  
Andrew Hubbard  
Managing Director  
Bathgate Flooring Ltd