



# Whistleblowing Policy

## MDS Global

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# Important Notice

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# 1. Purpose of policy and procedure

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This policy aims to provide you with clear guidance on how to raise concerns that you may have at work in a responsible and effective manner. If something is troubling you which you think we should know about or investigate, please use this policy. This policy is designed to enable you to raise concerns internally and to disclose information that may initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary procedure.

All colleagues are encouraged to raise genuine concerns and will have statutory protection if the concerns are raised in the right way. The Public Interest Disclosure Act 1998 (PIDA), gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

A Whistle-blower is defined as a person who intends to or has disclosed a concern shown in section 1.2, see below.

Please note for concerns regarding your own employment or how you have been treated, please use the Grievance Policy or the Bullying and Harassment Policy.

## 1.1. Who does this policy apply to?

The Whistleblowing policy applies to all employees, contractors, consultants, work experience, graduates, casual workers, and agency workers. It is the responsibility of everyone to familiarise themselves with the policy and any related documentation.

## 1.2. Scope of policy and procedure

This policy and procedure are followed by the company to enable a thorough investigation and to deal with the matter properly and sensitively. The procedure should be used by colleagues who wish to report or raise concerns regarding, but not limited to, the following:

- breach of internal policies and procedures
- unauthorised disclosure of confidential information
- criminal activity, bribery, or corruption
- financial malpractice or impropriety or fraud
- failure to comply with legal obligations
- danger to the health and safety of any individual or damage of the environment
- improper conduct or unethical behaviour
- a miscarriage of justice
- attempts to conceal the above

The concerns raised may be actions that are happening, have happened or are likely to happen.

### 1.3. Protection

This policy is designed to offer protection to those colleagues who disclose concerns relating, but not necessarily specific to, any of the areas set out in section 1.2 provided that the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure, that it tends to show malpractice or impropriety
- disclosed verbally or in writing to a relevant line manager, senior manager, HR Director or CEO (see section 4.0)

Those colleagues who choose not to follow this procedure when disclosing their concerns, may not be protected from internal disciplinary procedures and similarly in extreme cases where we determine allegations have been made maliciously or with a view to personal gain.

## 2. Disclosing your concerns

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You can disclose your concerns in writing or verbally to your line manager, Head of Department, HR Director or CEO providing as much detail with supporting evidence as possible.

The Company will treat all such disclosures in a confidential and sensitive manner. To investigate concerns and conduct an appropriate enquiry, an investigating manager will be appointed by the HR department and dependent upon what specialist knowledge is required. Only unless necessary, will any whistleblowing report be disclosed outside of the named contacts.

The role of the investigating manager is to ascertain what has gone wrong and what remedial actions can be put in place to rectify the situation. Additionally, to reduce the risk of reoccurrence, recommendations for change can also be made.

Alternatively, you may raise your concerns through Lumine's whistleblowing hotline at [abc@luminegroup.com](mailto:abc@luminegroup.com).

## 3. Investigating the allegation

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On receipt of the concern to a named contact, the Company will treat it seriously and promptly investigate your allegation by following the procedure detailed within section 3.1, taking whatever action it considers appropriate at that time. Your assistance may be required during the investigation.

Should evidence come to light that indicates possible criminal activity, then the Company will inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

### 3.1. Procedure

The Company will follow the procedure outlined below:

- Ensure that all available details are obtained in writing with supporting evidence where possible
- Reassure the colleague who raised the concern that they are protected under the Public Interest Disclosure Act 1998 (PIDA) and keep them informed of progress
- Inform the worker/s against whom the concern or complaint has been made as soon as practically possible
- Inform the colleague/s that they have a right to be accompanied by a fellow colleague or trade union representative at any further investigation meeting
- Consider and inform if appropriate due to the nature of the concern, the SLT, CEO and or Police
- Thoroughly investigate the allegation/s and where appropriate involve assistance from the HR department
- Keep the worker who raised the concern informed during the investigation
- Make an objective assessment of the concern and determine the validity of the concern or complaint
- Depending on the nature of the concern, and once a full investigation has taken place, the HR Director, SLT member or CEO will decide on the appropriate course action. This may involve invoking the disciplinary or other appropriate company procedure
- Provide the colleague who raised the concern with an outcome and confirmation that the matter has been dealt with. However, sometimes the need for confidentiality may prevent us from disclosing the outcome e.g. if disciplinary action is taken against somebody else this will be confidential

When information is disclosed in accordance with this procedure, every effort will be made to keep your identity confidential in so far as is reasonably practicable. The investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

The Company will make best endeavours to deal with any concerns fairly and appropriately, however this will not always guarantee that the Whistle-blower will be happy with the outcome. Should you feel dissatisfied with the investigation, you may raise the complaint externally to prescribed bodies such as the Health and Safety Executive.

### 3.2. Timescales

Due to the varied nature of whistleblowing concerns, it is not possible to state precise timescales associated to investigations. Every effort will be made to ensure that investigations are undertaken as quickly as possible whilst not compromising the effectiveness of the investigation.

## 4. Anonymous disclosures

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We hope colleagues feel able to raise concerns openly under this policy. However, should you wish to raise concerns anonymously we will make every effort to ensure your identity is not disclosed except if this is overridden by law. In situations whereby, your identity must be disclosed this will be discussed with you prior to your identity being revealed. We do not encourage colleagues to make disclosures anonymously as this may impact the credibility and effectiveness of the investigation. Concerns expressed anonymously could be perceived as less credible but may be considered at the discretion of the company. In exercising this discretion, the factors that will be considered will include:

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

## 5. Misuse of this policy

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The Company will take appropriate action against a colleague that is found to have:

- victimised a colleague for reporting genuine concerns
- made malicious or vexatious claims against a colleague and or the Company.

## 6. Contractual Status of this policy

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This policy does not form part of your contract of employment and is subject to change at the discretion of MDS Global.





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