Whistleblowing Policy

1. Purpose

This Whistleblowing policy is intended to cover concerns that are in the public interest and is designed to enable Excalon employees to raise any such concerns internally, in a responsible and effective manner at the highest level, and to disclose information that the individual believes shows malpractice or impropriety. Any concerns raised will be investigated in the first instance and may then lead to other Company policies and procedures being invoked, e.g. disciplinary procedures.

It is a fundamental term of every contract of employment that our employees will maintain confidentiality and not disclose externally any information regarding the Company's business affairs.

However, if an employee brings a wrongdoing to the attention of the Company, they will be protected in certain circumstances under the Public Interest Disclosure Act 1998. This is commonly known as 'blowing the whistle'. This law that protects whistle-blowers is for the public interest – so people can speak out if they find malpractice in the organisation. 'Blowing the whistle' is also more formally known as 'making a disclosure in the public interest'.

2. Reference Documents

- Public interest disclosure act 1998
- Excalon disciplinary policy – (HR005 disciplinary)
- Excalon grievance policy – (HR006-grievance)

3. Policy

This policy will describe the process employees should take if they suspect serious malpractice or wrongdoing within the organisation and provides assurance that this information can be disclosed internally without fear of reprisal. The aim of this policy is to:

- Ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve anything improper, unethical or inappropriate
- Encourage all improper, unethical or inappropriate behaviour to be identified and challenged
- Provide clear procedures for the reporting of such matters
- Manage all disclosures in a timely, consistent and professional manner
- Provide assurance that all disclosures will be taken seriously, treated as confidential and managed without fear of retaliation.

When should I speak up and who should I contact?

You are protected by law if you register a complaint that counts as whistleblowing as follows:

- A criminal offence, financial malpractice or impropriety or fraud
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- Criminal activity or the Company is breaking the law
- You believe someone is covering up wrongdoing

Only genuine concerns should be raised under this policy. If it is discovered that a concern is unfounded and has been raised 'maliciously' then the Company disciplinary policy can be invoked.

Unless in the public interest, complaints such as personal grievances, bullying, harassment or discrimination as examples, are not covered under the whistleblowing law or policy. You should report these under the Company grievance policy instead. (Reference H006-Grievance)

How do I speak up and what should I do?

You can raise your concerns by email, orally or in writing to HR@excalon.com, stating you are using this Policy.

We request that, where possible, you include the information below:

- An outline of the known or suspected wrongdoing
- Details, to the best of your knowledge, about when, where and how it occurred
- A list of the names of those suspected of being involved
- A list of the names of anyone who may be a witness and have relevant information
- Details of how you came to know about the suspected activities
- The names of anyone who you have discussed or reported this incident to
- The date and time of making the report.

You will not be expected to prove the wrongdoing that you believe you have witnessed or suspect – the Company will record your concerns and carry out an independent investigation.

If you are unable to report your concerns internally, a list of prescribed people and bodies can be found at www.gov.uk.

What happens when speaking up?

The person you contact will acknowledge receipt of your concern within 3 working days and reply to you to discuss the next steps with you. If you attend any meetings as part of this process, you may choose to be accompanied to this meeting by a work colleague or recognized Trade Union Representative. The person managing the meeting may report the incident to other internal departments.

Investigation

Excalon will decide how to respond in an appropriate manner under this Policy. An investigation will be conducted as speedily and sensitively as possible in accordance with all relevant laws and regulations. The purpose of this investigation is to:

- Establish if a wrongdoing has occurred, and if so to what extent
- Minimize the risk of further wrongdoing
- Protect all sources of evidence
- Prevent any damage to reputation.

As far as is reasonably practical, the confidentiality of the person reporting the suspected wrongdoing will be maintained.

It is not possible to set a specific timeframe for completion of investigations in advance, as the diverse nature of the potential disclosures makes this unworkable.

Investigations would generally be managed internally, however, we may appoint an external investigator or investigation team if we think it appropriate.

Any person found to be involved in any wrongdoing will be subject to investigation using the disciplinary policy and process. (Reference – HR005-Disciplinary)

Safeguarding

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- In good faith
- To an appropriate person
- In the reasonable belief that the individual making the disclosure intends to show genuine malpractice or impropriety.

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegation could give rise to legal action on the part of the persons complained about.

Confidentiality

Excalon will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential if it does not hinder or frustrate any investigation. However, 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.

If it is necessary for you to be involved in an investigation (for example by providing evidence), the fact that you made the original disclosure will, so far as reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimization or determine because of having made a disclosure.

Anonymous allegations

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 considered will include:

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

Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. However, in making a disclosure the individual should exercise due care to ensure the accuracy of the information.

If it is proven that an individual has made malicious or clearly untrue allegations, and particularly if he or she persists with making them, the Company disciplinary process will be invoked.

4. Records Management

All employees must maintain all records relevant to administering this process and procedure in line with Legislative and the company record keeping system.

5. Policy Review

The Company will monitor its policies, processes and procedures to implement changes to improve them and ensure that they comply with best practice, legislation changes and the emerging marketplace.

Version History: HR009 Whitleblowing			
Document Version	**Version Date**	**Revision Description**	**Author**
0.1	18/09/2015	Initial	Katrina Beck
0.1	19/09/2016	No Change	Katrina Beck
0.1	19/07/2017	No Change	Laura Henshaw
0.2	01/08/2018	Minor aments & formatting	Katrina Beck
0.2	16/12/2019	No Change	Katrina Beck
0.2	30/06/2021	No Change	Katrina Beck
0.2	08/08/2022	Addition of link to prescribed bodies	Katrina Beck
0.3	01/09/2023	Annual Review - No Change	Katrina Beck

DISTIRUBITON LIST		
Name	**Role**	**Location**
Company Wide	All Employees	All Offices

Signed on behalf of Excalon Ltd: _____ Kevin O'Donnell | Managing Director