

# **Whistleblowing Policy**

**National World plc**

Last Revised June 2024

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## Policy Statement

The Company is committed to conducting its business with honesty and integrity, and it is expected that all staff will maintain high standards in accordance with the Company's Code of Conduct and Code of Ethics. The Company believes that it is important for all colleagues to report any concerns that they may have or become aware of in relation to fraud, misconduct or any other wrongdoing so that the concerns can be properly dealt with.

The aims of this Policy are:

- to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- to provide staff with guidance as to how to raise those concerns; and
- to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all directors, employees, officers, consultants, contractors, casual workers and agency workers.

The Board has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy.

This policy is not intended for use in relation to alleged breaches of your own contract of employment, to raise a grievance or in respect of allegations of bullying and harassment. In such circumstances, you should refer to the Grievance or Bullying and Harassment policies for advice about the process you should follow. If you are not sure about which policy to use, please refer to your manager or HR in the first instance.

This policy is non-contractual and the Company reserves the right to make any necessary alterations or amendments as required to meet the changing needs of the business or as legislation dictates. Updated versions of this policy will be published on the HR Policy Page and on the corporate website.

## Raising Concerns

Where you have concerns about wrongdoing or potential wrongdoing within the Company you should raise this immediately. Concerns that can be raised under this policy need to be in the public and Company interest and must be about one of the following:

- A criminal offence;
- Failure to comply with a legal or professional obligation or regulatory requirement;
- A miscarriage of justice;

- Endangering the health and safety of an individual;
- Non-compliance with any Health, Safety or Environmental legal obligations;
- Damage to the environment;
- Bribery under the Company's Anti-Bribery and Corruption Policy;
- Facilitating tax evasion;
- Financial fraud or mismanagement;
- Breach of the Company's internal policies and procedures including the Company's Code of Business Conduct;
- Conduct likely to damage the Company's reputation or financial wellbeing;
- Unauthorised disclosure of confidential information;
- Negligence;
- Other workspace-specific concerns; and
- The deliberate concealment of any of the above.

The Company will ensure that you do not suffer any detriment in your continued employment and that you will not suffer victimisation as a result of raising a legitimate concern. The Company will not tolerate any treatment of this kind towards anyone who has raised a concern and such behaviour will be considered a disciplinary offence.

If you raise a concern under this policy and it is later found that the allegations made are malicious or deliberately false or frivolous, disciplinary action may be taken against you in accordance with the Company's Disciplinary policy. However, where legitimate concerns have been raised, even if the colleague is mistaken, provided that they acted responsibly and honestly when making the disclosure, they will not suffer a detriment as a result.

You should make sure that in raising a concern you have complied with the Company Policies and Procedures. For example, if you were to hack into the IT system to highlight a weakness in security, this act would be in breach of Company Policy and so could lead to disciplinary action being taken against you.

An instruction to cover up any wrongdoing is itself a disciplinary offence. If you are told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent and you should report the matter to the HR Director.

### **Process for Raising a Concern**

If you reasonably suspect that wrongdoing is occurring, has occurred or is likely to occur within the Company, you should raise this immediately. It is not necessary for you to have proof of this and you should not undertake your own investigation. The Company will ensure that a thorough investigation is completed into any allegations raised.

Concerns should be raised in the first instance with your manager. Your manager will then take any action necessary to resolve any issues that have been raised or to escalate this further.

If it is not possible to resolve your concerns through informal discussion, you believe that your supervisor/manager is involved in the wrongdoing, or you have any concerns about approaching your manager you should contact the HR Director. Upon receiving your concerns, the HR Director will appoint an appropriate manager to investigate.

The Company will arrange a meeting with you as soon as possible to discuss your concern. 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.

The Company will take down a written summary of your concern and provide you with a copy after the meeting. The Company will also aim to give you an indication of how it proposes to deal with the matter.

The investigating manager will report their findings to the Audit and Risk Committee, where it will be reviewed by the committee members, who will take any necessary action, including reporting the matter to any appropriate government department or external regulatory agency including the Police. If the outcome of the investigation discovers any misconduct,

the Company's Disciplinary procedure will be used. The outcome of the investigation and proposed action will also be reported back to you, subject to any confidentiality and/or legal constraints. Timescales for doing this will depend on the nature of the concerns raised. You should treat any information about an investigation as confidential.

### **Escalation Process**

If, following the investigation, you have reasonable belief the investigation manager has failed to undertake a thorough investigation or has failed to report the outcome of the investigations to the Board as required, you should inform the HR Director. The HR Director will make any necessary enquiries and arrange for another manager to review the investigation carried out.

Following this review the investigation manager will report the outcome of their findings to the Board, if appropriate, who will take any necessary action, including reporting the matter to any appropriate government department or external regulatory agency including the Police. If the outcome of the investigation discovers any misconduct, the Company's Disciplinary procedure will be used. The outcome of the investigation and proposed action will also be reported back to you, subject to any confidentiality and/or legal constraints. Timescales for doing this will depend on the nature of the concerns raised.

### **Confidentiality**

All concerns will be treated in confidence and where possible every effort will be made not to reveal your identity if you raise a concern.

Concerns may be raised anonymously; however, this can make it difficult for the Company to provide feedback to you and ensure that you do not suffer any detriment as a result of you raising your concern. The Company therefore encourages all colleagues to avoid raising concerns anonymously. If you are concerned about possible reprisals if your identity is revealed then you should contact the HR Director and appropriate measures can be taken to preserve confidentiality. If you are in any doubt you can seek advice from the Company's Helpline SeeHearSpeakUp or Protect (formerly Public Concern at Work), the independent whistleblowing charity who offer a confidential helpline (contact details for both are at the end of this policy).

### **Raising Concerns Outside the Company**

If, after following the internal process, you believe that the appropriate action has still not been taken, you should report the matter to the appropriate 'prescribed person' designated by the Public Interest Disclosure (Prescribed Persons) Order 2014, or any statute or statutory instrument which subsequently supersedes this legislation. Prescribed persons are mainly regulators and professional bodies but can include other individuals depending on the nature of the disclosure being made.

These include:

- Home Office
- HM Revenue and Customs
- Financial Conduct Authority
- Health and Safety Executive
- Environment Agency
- Information Commissioner
- Serious Fraud Office

Before doing so the Company encourages you to seek advice before reporting a concern to anyone external. There is a confidential helpline operated by Protect, if you believe that disclosure within the Company is inappropriate or as noted previously has been unsuccessful, there is also the Company's external Helpline SeeHearSpeakUp.

Disclosures made to legal advisors in the course of obtaining legal advice will be protected.

Whistleblowing concerns usually relate to the conduct of the Company's staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, the Company encourages you to report such concerns internally first. You should contact your line manager or the HR Director.

It is expected that all colleagues must use this internal process before raising any concerns externally. If you raise a concern outside the Company, you should ensure that it is to one of the above listed organisations, or other 'prescribed persons'. In reporting any matter to an external regulator, you should ensure that you do not divulge any confidential, personal or sensitive information in relation to customers or other employees.

## **Contacts**

HR Director

Claire Jackson

Protect

<https://protect-advice.org.uk/>

SeeHearSpeakUp

Helpline: 0800 988 6818

Online: [www.seehearspeakup.co.uk/file-a-report](http://www.seehearspeakup.co.uk/file-a-report)

Username: Nationalworld and Password: Nw9136

Email: [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)