

Policy Statement

Safespear are committed to their personnel conducting business with honesty and integrity. All employees are expected to maintain high standards in accordance with the Safespear Code of Business Conduct and Ethics Policy, the Safespear Anti-Bribery & Corruption Policy and the Safespear Gifts and Hospitality Policy. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage employees 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 employees with guidance as to how to raise those concerns
- To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

Who is covered by this Policy?

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as **employees** in this policy).

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Failure to comply with any legal or professional obligation or regulatory requirements
- Bribery
- Financial fraud or mismanagement
- Negligence
- Breach of internal policies and procedures including the Safespear Code of Business Conduct and Ethics Policy, Anti-Bribery & Corruption Policy and Gifts and Hospitality Policy
- Conduct likely to damage the reputation of Safespear
- Unauthorised disclosure of confidential information; and
- The deliberate concealment of any of the above matters

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Compliance Officer whose contact details are at the end of this policy.

Raising a Whistleblowing Concern

Any concerns applicable to this policy should be raised with one of the following:

1. Your Line Manager
2. The Compliance Officer
3. Safecall Ltd

Contact details are set out at the end of this policy.

If the concern is raised internally at Safespear, a meeting will be arranged 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.

A written summary of your concern will be taken at this meeting and a copy provided to you after the meeting. You will also be given an indication of how it is proposed that the matter be handled.

Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

External Disclosures

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. However, in an instance where you do not feel it is possible to report your concerns internally and have them dealt with effectively, the external provider Safecall should be contacted.

We strongly encourage you to seek advice before reporting a concern to anyone external, other than Safecall. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, agent, supplier or service provider. We encourage you to report such concerns internally to Safespear first. You should contact your line manager or the Compliance Officer for guidance.

Investigation and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the Whistleblower will be subject to disciplinary action.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Compliance Officer in the first instance or the Chairman. Contact details are set out at the end of this policy.

Protection and Support for Whistle blowers

It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Employees must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases,

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the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

Responsibility for the Success of this Policy

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

The Finance Director has day-to-day operational responsibility for this policy and must ensure that all managers and other employees who may deal with concerns or investigations under this policy receive regular and appropriate training. The Finance Director, in conjunction with the Board, should review this policy from a legal and operational perspective at least once a year.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Officer.

Contacts

Compliance Officer	Louise Birnie louise.birnie@safespear.com.au
Safecall External Whistleblowing reporting provider, as engaged by Safespear.	<u>Reporting Lines</u> Australia originating calls: 0011 800 7733 2255
Public Concern at Work (Independent whistleblowing charity)	Helpline: +44 (0) 20 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk