

WHISTLEBLOWING POLICY

1. Purpose and Scope

- (a) All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The Company believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation the Company believes it can help prevent malpractice—prevention is better than cure. That is the aim of this policy.
- (b) By encouraging a culture of openness the Company wants to encourage you to raise issues which concern you at work. You may be worried that by reporting such issues you will be opening yourself up to victimisation or detriment, or risking your job security; that is quite understandable. However, all staff now enjoys statutory protection if they raise concerns in the right way. This policy is designed to give you that opportunity and protection. Provided you are acting in good faith, it does not matter if you are mistaken. There is no question of you having to prove anything.
- (c) If there is anything which you think the Company should know about please use the procedure outlined in this policy. By knowing about malpractice at an early stage the Company stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please, do not hesitate to “blow the whistle” on malpractice.
- (d) This policy is not the normal Grievance Procedure. If you have a complaint about your own personal circumstances then you should use the normal Grievance Procedure. If you have concerns about malpractice within the organization then you should use the procedure outlined in this policy.

2. Policy

- (a) The Company is committed to this policy. If you use this policy to raise a concern the Company gives you its assurance that you will not suffer any form of retribution, victimisation or detriment. The Company will treat your concern seriously and act according to this policy. You will not be asked to prove anything. If you ask for a matter to be treated in confidence the Company will respect your request and only make disclosures with your consent. You will be given feedback on any investigation and the Company will be sensitive to any concerns you may have as a result of any steps taken under this procedure.

Signed: 
Andrew Williams
Managing Director
Date: January 2026

- (b) If you are concerned about any form of malpractice you should normally first raise the issue with the Company Secretary. There is no special procedure for doing this—you can tell the Company Secretary about the problem or put it in writing if you prefer.
- (c) If you feel you cannot tell the Company Secretary, for whatever reason, please raise the issue with Roger Williams.

3. How the Company will respond

- (a) After you have raised your concern the Company will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.
- (b) As far as possible, the Company will keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

4. Raising your concern externally (exceptional cases)

- (a) The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take.
- (b) However, if for whatever reason, you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with the appropriate regulator. For a list of those bodies which are recognised for this purpose see **Appendix I**.

Caution: If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making wider disclosure. However, whistleblowers who make wider disclosures of this type will only be protected (from victimisation and suffering detriment) in certain circumstances. The Company recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.

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Andrew Williams
Managing Director
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WHISTLEBLOWING—APPROPRIATE REGULATORS

The identity of the appropriate regulator will depend on the nature of your concern. However, the regulator must be one of those prescribed by an order made by the Secretary of State for the purposes of the Public Interest Disclosure Act 1998 Section 43F. The Public Interest Disclosure (Prescribed Persons) Order 1999 lists the prescribed regulators. They include:

- Accounts Commission for Scotland and auditors appointed by the Commission to audit the accounts of local government and health service bodies;
- Audit Commission for England and Wales and auditors appointed by the Commission to audit the accounts of local government and health service bodies;
- Building Societies Commission;
- Certification Officer;
- Charity Commissioners for England and Wales;
- Chief Executive of the Criminal Cases Review Commission;
- Chief Registrar of Friendly Societies;
- Civil Aviation Authority;
- The competent authority under the Financial Services Act 1986 Part IV;
- Commissioners of Customs and Excise;
- Commissioners of the Inland Revenue;
- Comptroller and Auditor General of the National Audit Office;
- Auditor General for Wales;
- Information Commissioner;
- Director General of Electricity Supply;
- Director General of Fair Trading;
- Director General of Gas Supply;
- Director General of Telecommunications;
- Director General of Water Services;
- Director of the Serious Fraud Office;
- Environment Agency;

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- Financial Services Authority;
- Friendly Societies Commission;
- Health and Safety Executive;
- Local authorities which are responsible for the enforcement of health and safety legislation;
- Investment Management Regulatory Organization;
- Occupational Pensions Regulatory Authority;
- Personal Investment Authority;
- Rail Regulator;
- Securities and Futures Authority;
- Treasury;
- Secretary of State for Trade and Industry;
- Local authorities which are responsible for the enforcement of consumer protection legislation;
- A person ('person A') carrying out functions, by virtue of legislation, relating to relevant failures falling within one or more matters within a description of matters in respect of which another person ('person B') is prescribed by the Public Interest Disclosure (Prescribed Persons) Order 1999, where person B was previously responsible for carrying out the same or substantially similar functions and has ceased to be so responsible.

Signed: 
Andrew Williams
Managing Director
Date: January 2026