

WANT TO REPORT A CONCERN?

WHISTLEBLOWING POLICY / MAKING A PROTECTED DISCLOSURE

INTRODUCTION

Under certain circumstances, employees and other business partners have legal protection if they make disclosures about organisations for which they work or work with. These are commonly referred to as 'whistleblowers' and their activities have often received wide publicity in the media. There is legislation designed to protect people from suffering any detriment or termination of engagement for whistleblowing, but only where the following procedure is adhered to.

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers, agency workers, suppliers, customers and any other of the Company's supply chain or business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as 'qualifying disclosures'. Disclosures are qualifying disclosures where it can be shown that the Company commits a 'relevant failure' by:

- Committing a criminal offence.
- Failing to comply with a legal obligation.
- A miscarriage of justice.
- Endangering the health and safety of an individual.
- Environmental damage.
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening or is likely to happen. The actions mentioned above are taken very seriously by the Company and we will take every measure to remedy any form of malpractice.

THE PROCEDURE

If you so wish, you should in the first instance report any concerns you may have to either:

- The confidential Whistleblowing Hotline by calling +44 (0)161 934 2278,
- The confidential Whistleblowing email address whistleblowing@upgs.com or
- The Human Resources Director who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you may then raise the matter with the appropriate organisation or body, e.g. the police, Environment Agency, Health and Safety Executive or Social Services Department.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the Company. In most cases you should not find it necessary to alert anyone externally.

The law recognises that, in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

CONFIDENTIALITY

We hope that anyone will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate but will be accepted should there be no alternative option provided. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

PROTECTION & SUPPORT FOR WHISTLEBLOWERS

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Human Resources Director immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.