

Policies and Procedures

WHISTLEBLOWING POLICY

Purpose

Wise Origin (WO) always strives to conduct its business with the highest standards of integrity and honesty. It expects all employees, freelance, temporary and sub-contractors to maintain the same standards in everything they do. All WO employees are therefore encouraged to report any wrongdoing by the Company or its employees that falls short of these business principles.

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace, but it is the aim of this Policy to ensure that as far as possible all employees are able to report any wrongdoing at work which they believe has occurred, is occurring or is likely to occur in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them as an individual who has raised such a concern. It is also to ensure that you will be protected from reprisals or victimisation for having raised your concern in good faith.

Definition of Whistleblowing: 'Whistleblowing' is a term used to refer to internal or external disclosure of malpractice as well as illegal acts, or omissions at work.

These legitimate concerns about specified matters are called 'qualifying disclosures. A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief that;

- A. A criminal offence which includes fraudulent and corrupt behaviour, e.g. theft, fraud or malpractice
- B. A miscarriage of justice
- C. An act creating risk to health and safety
- D. An act causing damage to the environment
- E. A breach of any other legal obligation
- F. An act causing radicalisation or extremism
- G. Concealment of any of the above is being, has been, or is likely to be, committed; a reasonable belief is sufficient.

Is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue.
- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to the Senior Leadership team.

Procedure

Employees are encouraged to use the procedure set out below if they have any concerns at all about wrongdoing at work as set out in the principles of this policy.

(1) You can make your disclosure orally, but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure you should:

- provide any relevant context and background, including relevant dates, venues, names etc.
- you should state clearly the reason why the situation causes for concern.

You must make sure that you are clear about why you are raising a concern using the whistleblowing policy and whether you wish for your identity to be kept confidential. While we will make every effort to do this in some cases depending on the circumstances of the case this may not be possible.

- In the first instance any concerns should be raised with the employee's own Line Manager. If the employee believes the Line Manager to be involved or for any reasons does not wish to approach their Line Manager the employee should contact their next level of Line Management in the first instance.

(2) If the matter requires further investigation, such an investigation will be carried out and the employee will be informed of the outcome and what, if any, action has been taken. If the employee remains unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, they should refer the matter to HR. When the complaint has been investigated, they will be informed of the result and what, if any, action has been taken. If the employee is concerned that their line manager, investigating manager or HR is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the

investigations, they should inform a member of the SLT at WO, who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report.

(3) If on conclusion of stages 1 and 2 the employee reasonably believes that the appropriate action has not been taken, they should report the matter to the proper authority. In exceptional or urgent circumstances, however, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies. These include:

- HM Revenue & Customs;
- the Financial Conduct Authority (formerly the Financial Services Authority).
- the Competition and Markets Authority.
- the Health and Safety Executive.
- the Environment Agency.
- the Independent Office for Police Conduct; and
- The Serious Fraud Office.

If it should become clear that the procedure has not been invoked in the public interest, for example for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of the Company's Disciplinary Procedure. In the event that an employee believes they are being subjected to a detriment by any person within the Company as a result of a decision to invoke the procedure, they must inform HR immediately and appropriate action will be taken to protect them from any reprisals.

Data protection

When an individual makes a disclosure, the organisation will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Review of the Policy

The Whistleblowing Policy will be revised annually by the Senior Management Team and Director.

Policy Review	Review Date	Next Review Date	Approved by
Annually	1 st October 2024	25 th July 2025	Umair Khan