

Public Interest Disclosure Policy ('The whistleblowing Act')

As you know, the Company stresses to all staff that it expects its business to be conducted with the highest standards of integrity and honesty at all times. The Company expects that you will work to achieve this aim and to ensure that the Company maintains these high standards.

In the unlikely event that you become aware of any wrongdoing at work (whether by the Company or any employee) which you believe has occurred or is likely to occur and which may lead to the Company's integrity being compromised then you are encouraged to report this as soon as possible.

The aim of this policy is to give you the confidence to report any such wrongdoing at work even if you believe that the Company itself is responsible for the wrongdoing. Any such report should be to do with a concern which is in the public interest. The policy sets out who any such report should be made to and how the matter will be dealt with. A report of any wrongdoing covered by this policy will be treated confidentially.

If you make a report, in good faith, of any wrongdoing at work relating to any of the following or any attempt to conceal any of the following then you will not suffer any detriment as a result of making such a report:

- a criminal offence;
- a failure to comply with legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any person; or
- an environmental risk.

Should you feel that you have suffered any detriment as a result of reporting a wrongdoing in accordance with this policy then you should bring a grievance as detailed in the Grievance Procedure included with these rules. Any such complaint will be treated seriously and confidentially.

Making a report

Initially you should discuss your concerns informally with your Supervisor. Where an investigation is required that your manager will carry this out. You will be kept informed of the progress and outcome of this investigation and what action, if any, it has been necessary to take.

Where an initial informal report to your manager is inappropriate, or if you have concerns about the speed or outcome of the investigation then you should refer the matter to the Managing Director. Your concerns will be investigated and you will be kept informed of the progress of the investigation, its outcome and any action which the Company deems it appropriate to take as a result.

Any use of this procedure to make a report other than in good faith may lead to disciplinary action being taken against you.