

	<b>WHISTLEBLOWING POLICY</b>	Document No	WP1
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## INTRODUCTION

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to company activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Whistleblowers are protected by law under the Public Interest Disclosure Act 1998. Under this law, whistleblowers must not be treated unfairly or lose their job because they report suspected wrongdoing.

This Whistleblowing Policy sets out our principles and procedures to ensure that H W Wilson Limited operates to ethical, professional, and legal standards in an honest and open manner.

## POLICY STATEMENT

H W Wilson Limited are committed to conducting our business with honesty and integrity and expect all H W Wilson Limited personnel to maintain high standards. Any suspected wrongdoing should be reported to your line manager and/or the Managing Director as soon as possible.

In line with that commitment, H W Wilson Limited expect all personnel, who have serious concerns about any aspect of the organisations work to come forward and voice those concerns.

This policy covers all employees, consultants, contractors, casual workers, and agency workers. It also includes suppliers and those providing services under a contract with the organisation.

H W Wilson Limited will constantly monitor and regularly review this Whistleblowing Policy in order to ensure its continuing suitability.

H W Wilson Limited will provide copies of this Whistleblowing Policy Statement to all employees during the company induction.

## POLICY AIMS

The whistleblowing policy aims to:

- provide avenues for you to raise concerns in confidence and receive feedback on any action taken.
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made a disclosure in good faith.

## HOW TO RAISE A CONCERN

H W Wilson Limited hope that in many cases you will be able to raise any concerns with your manager either verbally or in writing. However, where you prefer not to raise it with your line manager for any reason, you should contact the Managing Director.

H W Wilson Limited will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative (where applicable) to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Financial allegations require that the Director of Finance shall be notified of all financial or accounting irregularities or suspected irregularities.

The company will undertake monitoring of the personnel expenses records to ascertain any anomalies which may fall into the scope of this Policy.

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**CONFIDENTIALITY**

H W Wilson Limited hope that personnel will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity private and only reveal it where necessary to those involved in investigating your concern.

**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.

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. Citizens Advice can provide independent advice on whistleblowing.

**PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

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

Whistleblowers will 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 Managing Director immediately.

If the matter is not remedied, you should raise it formally using our Grievance Procedure.

H W Wilson Limited will not tolerate any threats or retaliation 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 H W Wilson Limited conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

For and on behalf of H W Wilson Limited

Peter Wiffen  
Managing Director

Signed:  .....

Date: 1<sup>st</sup> October 2024