



## **PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING) POLICY NON-CONTRACTUAL STAFF HANDBOOK**

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### 3 INTRODUCTION

We at all times conduct our business with the highest standards of integrity and honesty. We expect all staff to maintain the same standards in everything they do. Staff are therefore encouraged to report any wrongdoing by the Company or its staff that falls short of these business principles.

This is known as a ‘public interest disclosure’ or ‘whistleblowing’.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities.

The Public Interest Disclosure Act 1998 protects staff who report wrongdoing within the workplace but it is the aim of this policy to ensure that as far as possible our staff are able to tell us about any wrongdoing at work which they believe has occurred or is likely to occur.

To be covered by this law, when reporting a suspected wrongdoing or danger to the public a worker must reasonably believe that this will affect the public and show past, present or likely future wrongdoing falling into one or more of the following categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering of someone’s health and safety
- damage to the environment
- covering up wrongdoing in the above categories

This does not include personal grievances.

Forsberg is committed to compliance with the Bribery Act 2010, please refer to the Anti-Corruption and Bribery Policy - FSL-09-113. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee’s opinion, might constitute bribery or corruption.

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, staff, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers (collectively referred to as “staff” in this policy).

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these. This list is not exhaustive.

We recognise that staff may not always feel comfortable about discussing their concerns internally, especially if they believe that the Company itself is responsible for the wrongdoing. The aim of this policy is to ensure that staff are confident that they can raise any matter with the Company that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.

#### 3.1 PROCEDURES FOR MAKING A PUBLIC DISCLOSURE

The following procedure applies:

If appropriate, discuss the matter with a Line Manager in the first instance.

An informal approach to a Line Manager will be treated as completely confidential and will not result in any report to anyone within the Company unless you agree.

If the matter requires further investigation such an investigation will be carried out and you will be informed of the outcome of the investigations and what, if any, action has been taken.

If you remain unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, you should refer the matter to a member of the board of directors. When they have investigated your complaint, they will tell you the result of the investigation and what, if any, action has been taken.

If the matter is not remedied you should raise it formally using our Grievance Procedure. Refer to FSL-09-101 Grievance Policy.

### 3.2 CONFIDENTIALITY

We hope that staff 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 secret and only reveal it where necessary to those involved in investigating your concern.

### 3.3 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. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### 3.4 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We undertake that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47B Protected disclosures, of the Employment Rights Act 1996. In the event that you believe you are being subjected to a detriment by any person within the Company because of your decision to invoke the procedure you must inform your Line Manager immediately and appropriate action will be taken to protect you from any reprisals.

If it should become clear that the procedure has not invoked in good faith, 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.

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