

● 300

SPARTANS

LIMITED

WHISTLEBLOWING POLICY

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300 SPARTANS LIMITED

Whistleblowing Policy

1. Policy principles

- 300 Spartans Limited aims to conduct business with the highest standards of honesty and integrity. Therefore, we should all share this aim to maintain the same standards. Any wrong - doing by either the Company or its employees should be reported. We believe that it is essential to create an environment in which employee feel able to raise concerns internally without fear of disciplinary action being taken against them because of any disclosure and be assured that an investigation will take place.
- **The Public Interest Disclosure Act 1998** protects employees from dismissal or being disadvantaged, for example having disciplinary action taken against them when they report wrong – doing by their employers. It aims to promote greater openness between employers and employees in the workplace. We strongly believe that those report wrong – doing should not be victimised.

2. Scope of Policy

- The Whistleblowing Policy applies to all 300 Spartans Limited employees, customers, agency workers and contractors.
- This policy does not cover personal grievances including complaints about employment matters, which will be covered under the Grievance Policy.

3. Examples of wrong – doing include:

- A criminal act
- Failure to comply with a legal obligation
- A miscarriage of justice
- Danger to health & safety of any individual
- Damage to the environment or people
- Financial malpractice, impropriety, or fraud
- Mishandling or risks to data and/or information
- Deliberate concealment of any if the above.

4. Reporting concerns

- Where employees wish to make a disclosure concerning one or more of these examples of wrong – doing, you can discuss the concern with one of our office staff. They have a responsibility to listen and respond to any matter that is of concern to the employee. If this is not appropriate or the issue is not satisfactorily resolved, employee should contact the Director and a private interview will be arranged to review the case. The Director will ensure that a full and fair investigation will take place with a view to reaching a sensible and fair resolution of the issue.
- There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary, we reserve the right to make a referral on our behalf without your consent. We recognise that there may be some cases where no wrong – doing is found through internal procedures. In such cases, if the disclosure is reasonable and the information believed to be true, protection will be given, and no disciplinary action will be taken.
- Whistle – blowing is distinct from raising a grievance. If employee have a complaint relating to his personal circumstances in the workplace, it is likely to be more appropriate to use the Grievance Procedure to raise this. This process does not give employee the protection of the Public Disclosure Act. However, the Company will deal with grievances raised reasonably and promptly and will only consider taking disciplinary action where an employee has made dishonest or false statements or acted unreasonably in making a complaint or grievance. You must take clear that you are following the Grievance Procedure in this instance.
- If employee do not follow the procedure described above, and instead make a disclosure to another person or organisation outside the Company (also known as “whistle – blowing”) instead or prior to making the disclosure internally, this could render employee liable to disciplinary action, which may lead to dismissal.

5. Information needed to raise a concern

- The nature of the concern and its key elements
- When it happened
- Who was involved
- The background and reason behind the concern
- Whether they have already raised a concern with anyone and the response
- Any other relevant dates
- If applicable, any personal interests must be declared from the outset.

6. Procedure for Handling Concerns Raised

- All investigations will be conducted sensitively, as quickly as possible, and under this procedure. The investigation should be concluded within three months of the matter being raised, though some scenarios may result in a longer timeframe. While the Company cannot guarantee that the outcome will be as the employee may wish, the matter will be handled fairly and in accordance with the Whistleblowing Procedure.
- Once a concern has been raised, the person to whom a complaint has been raised to should arrange a meeting to establish facts and determine how the concern should be taken forward.
- At the meeting, the employee may be accompanied by a trade union representative or a colleague who is not involved in the area of work to which the concern relates if they wish. If the employee prefers, this meeting can be conducted over the telephone rather than face to face or in a suitable location away from the place of work.
- Within 10 working days the Director will also confirm in writing:
 - a. How it is proposed to deal with the matter
 - b. Whether further investigations will take place, or if not deemed appropriate, why this decision has been made
 - c. An estimate of how long it might take to provide a final response
 - d. What support can be offered to the individual raising the concern.
- Some concerns may be resolved by agreed action without the need for formal investigation. If urgent action is required, this may be taken before any investigation is conducted.
- The Company will aim to update the employee on the progress of the concern within 28 days of it being raised, where possible. However, in the event of a formal investigation or the involvement of police/security, the employee will receive sufficient information about the outcome of any investigation to enable them to be informed that the concern is being dealt with.
- Once the investigation has concluded, the individual will receive an explanation about how the concern has been addressed. If there are legal constraints, e.g. in a criminal investigation, the individual will receive sufficient information about the outcome of any investigation to enable them to be informed that the concern has been dealt with. If no further action is proposed the Director will inform the reasons for this in writing to the individual who has raised the concern.
- Throughout any investigation, the employee will still be expected to continue their duties/role as normal unless deemed inappropriate. An employee should not suffer any unfair or negative treatment because of raising a concern. Any such treatment should be raised and discussed with the manager handling the concern.