WHISTLEBLOWING POLICY

Introduction

An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns internally in a responsible and effective manner when they discover information which they believe shows serious malpractice.

Aims of this Policy

Th Company is committed to delivering high quality services to its clients and to that end expects high standards from its employees. In order to maintain those high standards, a culture of openness and accountability is vitally important. The aims of this Policy are:

- To encourage employees to raise concerns about malpractice within the organisation without
- Fear of reprisal;
- To reassure employees that their concerns will be taken seriously;
- To provide information about how to raise concerns and explain how the Company will respond.

The Policy is designed to assist individuals who believe they have discovered or witnessed improper conduct. This Policy applies to all staff and covers situations whereby an individual confidentially raises a concern about a risk, malpractice of wrongdoing that affects others such as co-workers, the company, clients, candidates, suppliers and public image, without fear of reprisal.

The company considers the following actions to be reportable wrongdoings:

- Immoral, illegal or unethical conduct (including fraud, corruption, financial maladministration, unauthorised use of company funds, health and safety breaches)
- Gross misconduct;
- A criminal offence.

Raising Concerns

All employees at all levels of the company are responsible for helping to assure that prohibited behaviour does not occur by reporting prohibited discrimination or harassment that they observe as soon as possible. The earlier you do so, the easier it is for us to take action.

You should raise your concerns with the Managing Director as soon as you suspect malpractice. You do not need to wait for evidence of a violation or malpractice prior to raising a concern. In circumstances whereby it is not appropriate to raise concerns with your line manager, for example, they may be the violator in question, or they may already be aware of the violation and appear to be overlooking it. In these cases, you should report your concerns to the Managing Director.

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Reports will be treated in the strictest confidence and all staff are protected from victimisation, harassment or disciplinary action as a result of disclosures made in good faith and not maliciously. The identity of the Whistleblower will be kept confidential and will not be revealed without prior consent. Please note that concerns that are raised maliciously, for personal gain or where they are known to be untrue may result in disciplinary action.

Investigation

The company is committed to its zero-tolerance policy and will investigate and address all reports of prohibited behavior. All disclosures made will be investigated in full and after initial enquiries, a decision will be made whether to launch a formal investigation. For whistleblowers who have made their identities known to us, you will subsequently be advised of the Company's decision to continue with an investigation or not.

Violations

Anyone who is proven to have violated our any of the Policies and Regulations outlined in this Policy will be subject to disciplinary action by the company. This disciplinary action may include termination of the violator's employment. Individuals who fail to advise the Managing Director of an actual or suspected violation may also be subject to such disciplinary action. Where a criminal offence has occurred, the company may report violations to the Police or a relevant regulating authority for further investigation.

Signed: 

Dean Jump
Role: Managing Director

Date: October 2026

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