Public Interest Disclosure (Whistleblowing)	Issue 03
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	Effective from: 01/01/2026
Policy Statement	updated: 01/01/2026
	Prepared by: Stacey Kokuciak
	Approved by: Steve Lamb

Statement

This Company is fully committed to ensuring that our practices and procedures, our standards of care to both our employees and customers, and the systems we operate are of the highest quality.

However, we recognise that, from time to time, employees may have legitimate concerns about the practices of any of their colleagues or of the business as a whole and fear disloyalty in speaking up.

The Company encourages employees to raise genuine concerns at the earliest possible stage and not to ignore issues which may have serious implications.

Anyone raising a malpractice concern will have the full support of the Company and should not fear harassment or victimisation.

The Company operate a Public Interest Disclosure Procedure which is intended to provide safeguards in confidentiality and disclosure of the interests of anyone implicated in such matters.

The procedure is intended to provide a mechanism for raising genuine concern by promoting a culture of openness and shared integrity to uphold the reputation of the Company.

In raising a malpractice concern it must be noted that the protection of the Law may be invalid if the matter is not raised internally within the Company before "going public". The procedure seeks to balance the need to provide safeguards for employees who raise genuine concerns about malpractice against the need to protect others against uninformed or vexatious allegations.

Procedure for reporting a malpractice.

Employees who wish to raise concerns or suspicions of inappropriate activities should follow the stages below:

Stage 1: In the first instance employees should raise the matter with their line manager. A Board Director should be informed if the employee felt that this approach was not appropriate.

Stage 2: The allegation should be discussed fully and if there are genuine reasons for the employee's concern an investigation will be carried out.

Stage 3: Once the investigations have been carried out the manager will consider whether the employee's concerns are justified and whether any action should be taken.

Stage 4: The manager will determine the nature of the action by discussion with the Board Director.

Stage 5: The employee raising the concern will be kept informed of the progress and if for any reason they are not satisfied with the decision or actions taken by their manager they will be entitled to pursue their concern through the Grievance Procedure.

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N.B.:
If the employee feels they are unable to raise the issue with any of the team in Stage 1 then they should contact HR, the relevant Board Director or the Board Managing Director with their concerns.

Type of Malpractice:

Typical examples of malpractice for the purposes of the Company's Procedure are:

- Fraud or financial irregularity.
- Corruption, bribery or blackmail.
- Criminal offences.
- Failure to comply with legal regulatory obligations.
- Miscarriage of justice.
- Endangering the Health or Safety of any individual.
- Leaking confidential information.
- Endangering the environment.
- Concealment of any of the above.

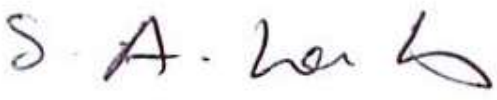
Protection:

The Company will take all reasonable steps to ensure employees are not victimised as a result of any action taken in accordance with this policy.

Under no circumstances will an employee be dismissed from their employment by reason of any action taken by them in accordance with this policy.

In the event that an employee feels they have suffered any form of detriment as a result of their actions in accordance with this policy they should immediately report this to the Managing Director.

Employees are reminded that disciplinary action is likely to follow an external disclosure made before the internal complaints' procedure has been pursued.



Steve Lamb
Chairman
Date: 01/01/2026