

WHISTLEBLOWING DISCLOSURE POLICY APRIL 2025

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing or making use of, in any form whatsoever, such confidential information. However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (listed below), be in the public interest, and the disclosure must also be made in an appropriate way.

If in the course of employment, an employee becomes aware of information which they reasonably believe to show one or more of the following, they must use the company's disclosure procedure set out below:

- That a criminal offence has been committed, is being committed or is likely to be committed.
- > That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- ➤ That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That the health or safety of any individual has been, is being or is likely to be endangered.
- > That information tending to show any of the above is being, or is likely to be, deliberately concealed.

Disclosure Procedure

Information which an employee reasonably believes tends to show one or more of the above should promptly be disclosed to a Director so that any appropriate action can be taken.

Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure. However, failure to follow this procedure may result in disclosed information losing its 'protected status'. For further guidance in relation to this matter or concerning the use of the Disclosure Procedure generally, employees should speak in confidence to the Director.

Duty to Report Misconduct

All employees are always expected to act with due diligence and utmost honesty. Should any matters of concern come to your attention you must report them immediately to your Manager. The Company sees it as your duty to report any acts of misconduct, dishonesty, breach of Company rules or breaches of the rules of any relevant regulatory bodies which may be committed, contemplated or discussed by any other member of staff or other third party.





The Company will treat whatever you have reported with confidentiality as far as this is practicable.

Should you fail to act in accordance with the above provisions the Company reserves the right to treat this as a disciplinary matter which could, if the circumstances warrant it, lead to summary dismissal.

DIRECTORS APPROVAL

This statement has been approved by the Directors who will review and ensure it is updated annually.

Luke Dwyer

Gary Dwyer