



WHISTLEBLOWING POLICY

We aim to conduct our business with the highest standards of integrity and honesty and expect all employees and workers to maintain these standards in everything they do. We therefore encourage anyone to report any perceived wrongdoing by our business or its employees, workers, contractors or agents that falls short of these principles.

This policy aims to assist us in detecting any inappropriate behaviour or practices at an early stage and to provide guidance and a clear procedure for employees and workers to report any wrongdoing at work which they believe has occurred or is likely to occur.

Individuals may feel concerned about any ramifications of discussing their concerns, especially if they believe that we are responsible for the wrongdoing. This policy aims to reassure them and encourage them to raise any reasonable concern about our business activities in the knowledge that it will be taken seriously, and that no action will be taken against them by either DePe Gear Company Ltd or their colleagues for raising the matter.

This policy is not contractual.

Who this policy covers

This policy covers all employees and workers, including those on part-time contracts. It also covers any casual workers or agency workers.

It aims to protect those who make a 'protected disclosure' either during their employment (or duration of the contract/agreement in the case of workers/agency workers) and also after this has ended, and it enables them to take action in respect of any victimisation.

CONTENTS

1. Definitions	3
2. Responsibility of directors, managers and employees/workers	3
3. Examples of concern	3
4. The procedure	4
5. Protecting those who make disclosures	4
6. Referral to external bodies.....	5
7. Ex-employees and workers	5
8. Related policies and documents.....	5
9. Review of this policy	5

Whistleblowing policy

1. Definitions

The types of concern covered by a protected disclosure include the following:

- a criminal offence
- the breach of a legal obligation or any statutory Code of Practice
- a miscarriage of justice
- a danger to the health and safety of any individual
- an environmental risk
- any attempt to conceal any of the above.

For a disclosure to be protected it must reasonably appear to the employee or worker that it is in the 'public interest'.

2. Responsibility of directors, managers and employees/workers

The overall responsibility for implementing and monitoring the effectiveness of this policy rests with the Directors of DePe Gear Company Ltd.

Managers and supervisors have a crucial role to play in encouraging employees and workers under their supervision to report any concerns they may have.

Employees are encouraged to 'blow the whistle' on malpractice. If we are alerted to any potential malpractice at an early stage, we can take the necessary steps to safeguard the interests of all employees and protect our business. Any employee or worker who has knowledge of, or reasonably suspects, any fraud, theft or other suspicious or unlawful act taking place within our business is required to report this to their manager, or to use the procedure set out below.

All employees and workers, irrespective of their job or seniority, are required not to subject any other employee or worker to any detrimental treatment nor harass or bully such an individual on the basis that they have raised a concern under this policy. They are also required not to encourage others to do so nor to tolerate such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of such behaviour. In addition, an employee or worker who has victimised a colleague may be personally liable for any victimisation.

3. Examples of concern

Examples of the types of concerns that may be raised include the following:

- misuse of assets (including stores, equipment, vehicles, buildings, computer hardware and software)
- failure to comply with appropriate professional standards
- bribery, corruption or fraud including the receiving or giving of gifts or hospitality in breach of our procedures
- falsifying records
- failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income to the business or may otherwise seriously prejudice it

- abuse of authority
- causing damage to the environment
- breach of equal opportunity
- breach of data protection legislation or data security
- not acting professionally or honestly in meeting the needs of our customers, contractors and suppliers.

Note that this policy is not intended to deal with any potential breaches of an employee's employment contract: these should be raised under our grievance procedure. Nor is it intended as a means to question our financial or business decisions, or to raise again any matters that have already been addressed under our grievance, disciplinary or other procedures.

4. The procedure

An employee or worker who has a concern about any of the above should raise the matter with any Director in the first instance. This can be done either verbally or in writing. However, if the individual feels unable to approach either of the Directors, for whatever reason, then any of the following, all of whom are designated to deal with such matters, may be approached: the Support Services Manager, any other manager or supervisor.

The employee or worker does not have to be able to prove the allegations but should have a reasonable and genuine belief that the information being disclosed is true: some allegations may prove to be unfounded, but we would prefer the issue or concern to be raised, rather than run the risk of not detecting a problem early on.

A disclosure may be made anonymously. Where requested, we will respect (so far as we can) the confidentiality of any whistleblowing complaint received but we cannot guarantee that the investigation process will not result in colleagues speculating on the identity of the whistleblower. We encourage openness as it is easier to follow up and to verify complaints if the individual is prepared to give their name. Unsupported anonymous complaints and allegations are much less powerful and therefore will be treated with caution.

We will respond to any disclosures in a reasonable and appropriate manner. This may involve making internal enquiries and an investigation which may be formal or informal, depending on the nature of the concern raised.

As far as possible, the person raising the concern will be kept informed of the outcome of any enquiries and investigations we conduct and what action, if any, has been taken. Individuals will not be informed where this would breach our duty of confidentiality to others. If the investigation involves outside agencies (e.g. the police) this may cause some delay.

An individual who is unhappy about the speed or conduct of the investigation, or the way in which the matter has been resolved, should refer the matter to any Director.

5. Protecting those who make disclosures

We undertake that no employee or worker who makes disclosure under this procedure will be subjected to any detriment as a result, and we will not condone any form of victimisation, bullying or other detrimental treatment of anyone who makes a protected disclosure.

If any individual feels that they are being subjected to detrimental treatment, bullying or harassment by any person within DePe Gear Company Ltd (including by their colleagues and co-workers) as a result of their decision to make a disclosure, they must inform one of the Directors immediately and appropriate action will be taken to protect them from any reprisals. Any victimisation, bullying or detrimental treatment will be dealt with under our disciplinary procedure.

However, if we discover that the disclosure has been made for malicious reasons or to pursue a personal grudge against another employee or against our business, this will constitute gross misconduct and will be dealt with through our disciplinary procedure.

6. Referral to external bodies

In most cases, it should not be necessary to contact external agencies to raise concerns. However, we recognise there may be matters that cannot be dealt with internally and external authorities (such as the police, the Health and Safety Executive, HMRC or external auditors) may need to become involved. Where this is necessary we reserve the right to make a referral without the employee's or worker's consent.

7. Ex-employees and workers

Any protected disclosures made by ex-employees or workers after the termination of their employment/engagement should also be dealt with under this procedure. In such cases, the employee/worker should set out their concern in writing and we will then respond in writing, having undertaken any appropriate investigation.

8. Related policies and documents

We also have the following related policies and documents: data protection policy; disciplinary procedure; grievance procedure; health and safety policy. Bullying and harassment policy.

9. Review of this policy

This policy will take effect from **date**. It will be reviewed on a regular basis following its implementation and may be changed from time to time.

Any queries or comments about this policy should be addressed to the Support Services Manager.