

Whistle Blowing Policy

INTRODUCTION

Wm Lee Ltd is committed to achieving and maintaining the highest possible standards with regard to behaviour at work, services to our customers and in all of our practices. All directors and employees are expected to conduct themselves with integrity, impartiality, and honesty.

"Whistleblowing" can be defined as raising a concern about wrongdoing within a company. The concern must be a genuine concern about a crime, criminal offence, danger to health and safety or to the environment. It would also include the cover up of any of these.

Employees are responsible for:

- Raising their concerns in writing as soon as they have a reasonable suspicion.
- Providing a full account and evidence for their concerns.
- Raising concerns in good faith and maintaining confidentiality regarding their concerns.

HOW TO RAISE A CONCERN & HOW WILL WE RESPOND

Staff are encouraged to raise concerns internally and we hope that if you have a concern about malpractice, you will feel able to raise it with a member of the management team or a company director.

Any concern raised under this policy will be investigated thoroughly, promptly, and confidentially.

Any approach to managers and directors will be treated with the strictest confidence and the member of staff's identity will not be disclosed without their prior consent. All members of staff will be treated with respect at all times. A member of staff raising the concern may be required to attend meetings to ensure we fully understand the nature of their concern.

When any meetings are arranged with an employee who has made a protected disclosure, they have a right to be accompanied by a trade union representative.

When an individual raises a concern, they will receive acknowledgement that their concern has been received, and an indication of how the matter will be dealt with and by whom. They will be told how long to expect the investigation to take and will be kept up to date with its progress.

The matters raised will usually be investigated internally. The investigation will be objective and evidence-based and will aim to identify and rectify any issues and learning lessons to prevent problems recurring. Those investigating may decide that the concern would be better looked at under another process, such as the grievance procedure or dignity at work procedure. If so, this will be discussed with the member of staff.

In the event that misconduct is discovered as a result of any investigation under this policy, the disciplinary policy and procedure will be invoked in addition to any external measures.

On conclusion of any investigation, the member of staff will be told the outcome of the investigation and what the Company has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.



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If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to Simon Alexander (Managing Director), who will arrange any further investigation as he thinks appropriate.

More serious disclosures may be referred to an external prescribed person or body and may form the subject of an independent inquiry.

In the event of an inquiry, where possible the trade union representatives will be consulted on the drawing up of terms of reference for any inquiry panel, as well as being involved in the implementation of any inquiry recommendations.

Status of this procedure

This procedure does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Signed on behalf of Wm. Lee Ltd

DATE: 07/08/2023.

Signed on behalf of Unite the Union

DATE: 07/08/2023.