



ELECO[®]

Whistleblowing policy and procedure

Eleco plc
Prepared by: Eleco plc for all employees
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Whistleblowing Policy and Procedure for all staff

(Conforming to the guidance in the Public Interest Disclosure Act 1998)

1. About this policy

1.1 Eleco plc is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. We aim to develop a culture of openness and accountability in order to prevent such situations occurring and to address them when they do occur.

1.2 As a result of this aim, it is fundamental that any concerns members of staff may have about suspected malpractice within the Eleco Group are aired. It is felt to be in all our interests to ensure that any malpractice does not occur.

1.3 To achieve this, Eleco has devised a policy and procedure to cover the airing of genuine concerns, which members of staff may have about suspected malpractice within the organisation.

1.4 The aims of this policy are:

(a) to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

(b) to provide staff with guidance as to how to raise those concerns.

(c) to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.5 The whistleblowing procedure is not incorporated by reference into your Contract of Employment and we may amend it at any time.

2. Who is responsible for this policy

2.1 This whistleblowing policy applies to all permanent and short-term employees of the Eleco Group. It also applies to secondees, external consultants, contractors and agency personnel whilst working at the company. There is no length of service requirement.

2.2 The Audit Committee has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Chairman of the Audit Committee has day-to-day operational responsibility for this policy. Contact details of the Chairman of the Audit Committee are found at the end of this policy.

3. What is whistleblowing?

3.1 Whistleblowing is the disclosure of information which relates to suspected malpractice at work. This includes (but is not confined to) criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; miscarriages of justice; danger to health and safety; damage to the environment; bribery; breach of our internal policies and procedures; conduct likely to damage our reputation or financial wellbeing; unauthorised disclosure of confidential information; negligence; or the deliberate concealment of any malpractice.

3.2 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Chairman of the Audit Committee.

4. How to raise a concern

4.1 If you have a concern about malpractice in the Group, you should inform your line manager in writing or by email of your concern. Your line manager will then raise the matter with the Chairman of the Audit Committee. If the concern involves the line manager, or if you feel they have not addressed your concern or for any reason you prefer them not to be told, you may raise the matter directly with the Chairman of the Audit Committee.

4.2 If you feel you need to take advice before doing so, you may contact the independent charity, Protect Advice. They provide confidential advice on whistleblowing matters and their contact details are found at the end of this policy.

4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. The Chairman of the Audit Committee may be accompanied by any member of Eleco staff.

4.4 We will take down a written summary of your concern and provide you with a copy after the meeting. The Chairman of the Audit Committee will conduct a full investigation with the objective of establishing whether malpractice has occurred. The format of the investigation may vary depending upon the circumstances, but we will give you an indication of how we propose to deal with the matter.

4.5 The Chairman of the Audit Committee will communicate the findings of the investigation to you as the person raising the malpractice concern; the individual(s) under investigation; and, if appropriate, those members of Eleco plc management or external authorities who need to consider whether action should be taken on the basis of the findings.

5. Confidentiality

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5.2 There may be circumstances, however, in which the company may be required to reveal a member of staff's identity. If this is the case, all reasonable steps will be taken to ensure that no detriment is suffered by the member of staff.

6. External disclosures

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any malpractice in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external (see the contact details for Protect Advice at the end of this policy).

7. Protection and support for whistleblowers

7.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

7.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chairman of the Audit Committee immediately.

7.3 If a malpractice concern is raised, the individual making the report will be taken seriously and will be treated fairly and justly by Eleco plc. All reasonable steps will be taken to ensure that no person under Eleco's control engages in victimisation in any form.

7.4 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

7.5 However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

8. Contacts

Chairman of the Eleco plc Audit Committee:

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