

Pektron Group Ltd – Whistleblowing Policy & Procedure

1. INTRODUCTION

At Pektron Group Ltd we take a responsible approach to business, we work hard to ensure that our business practices meet with legal requirements and we provide a safe working environment for all our staff. We take any allegations of wrongdoing very seriously, and encourage staff to speak out if they have an issue. It is important to distinguish between issues and complaints which are managed through our disciplinary and H&S policies and procedures and 'whistleblowing' which covers more serious wrongdoing which may lead to injury, financial loss and damage to the business' reputation.

2. POLICY OBJECTIVES / PURPOSE

The purpose of this policy is to define specifically what we mean by whistle blowing and how these issues differ from grievance issues. It also explains the process for any worker who feels they need to let a person in higher authority know about something they have seen or heard that they think they should 'blow the whistle' about.

3. WHO THIS POLICY APPLIES TO

Although principally aimed at employees and workers, our Whistle Blowing Policy and procedure can also be used by suppliers, business partners and others, to report any concerns about our business practices or conduct.

4. WHAT IS WHISTLEBLOWING?

Whistleblowing legislation protects individuals from dismissal or victimisation, should they disclose serious wrongdoing by colleagues or by their employer. This means that anyone who blows the whistle in good faith will not be subjected to any detrimental treatment for doing so. Any reports of such detrimental treatment will be taken extremely seriously.

Examples of whistleblowing may include alleged wrongful conduct by the employer, a fellow employee, a client or any third party working with the business and could include:

- Practices that may put people's health and safety in danger
- Practices within the business that could cause significant damage to the environment
- Criminal offences
- Breaches of legislation by the company
- Or covering up any of the above

5. WHAT IS THE DIFFERENCE BETWEEN A COMPLAINT THAT COULD BE CLASSED AS A WHISTLE BLOWING AND ONE THAT MAY LEAD TO A COMPLAINT OR GRIEVANCE BEING RAISED ?

Issues which could have a wider impact on the public interest are likely to be considered whistleblowing. Issues that are related to 'normal business' would be dealt with either through informal discussions or, failing that, by raising a grievance. The examples below demonstrate some of the differences between grievances and issues where individuals would be expected to blow the whistle:

Grievance issues	Whistleblowing issues
An individual complains about the type of work they are asked to do. They may, for instance, believe that the work does not form part of their role.	An individual discloses that they have been asked to carry out tasks which they genuinely believe to be illegal. E.g. falsifying tax returns.
An employee complains that he or she has received insufficient health and safety training.	An employee discloses that their team has been asked to take short cuts to meet production targets, which endanger safety.
An individual complains about the hours he or she is expected to work.	A disclosure is made stating that the requirements imposed by the business on a group of staff breaches working time regulations.
An individual is concerned about the amount of paper used in their department, and makes this complaint to their manager.	An individual discloses that the way a business disposes of its contaminated waste breaches environmental health laws.
An individual feels they are being bullied in the workplace.	An individual is aware that persistent bullying is taking place and, although it has been reported, it consistently fails to be addressed.
An individual wants to make a complaint because they were unsuccessful when applying for a new role.	An individual is aware of recruitment and selection practices taking place which directly disadvantage disabled people applying for roles in the organisation, breaching the Equality Act.

You should only follow the whistleblowing procedure if you genuinely believe that the disclosure you are making is in the public interest, or the interests of the wider business. Individual complaints should be handled through the grievance procedure.

6. WHAT SHOULD I DO IF I NEED TO BLOW THE WHISTLE?

In the first instance speak to your Line Manager, who will escalate the matter immediately to a Director. Any disclosures made are treated confidentially and the identity of the whistleblower, as far as is possible, is kept confidential, although no absolute promise of confidentiality can be made.

If you feel unable to approach your Line Manager about the issue then you may contact one of the following people:

Nesta Robinson, Directors PA: nrobinson@pektron.co.uk

Jane Keighron: Recruitment Manager jkeighron@pektron.co.uk

Tina Attenborough: Company Solicitor tina@attenboroughlaw.co.uk



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Protection for whistle blowers against detrimental treatment:

If you feel you are being subjected to detrimental treatment because you have acted as a whistleblower, you should speak to your Line Manager or one of the people listed above. Any such reports will be treated very seriously and could also include potential disciplinary action against individual colleagues.