

1 Whistleblowing Policy

1.1 Principles

HG&Co wishes to encourage a free and open culture in its dealing with employees and customers / service users. We need to be recognised by our customers / service users as honest and ethical in all our activities. We therefore actively encourage you not to turn a blind eye to malpractice and will support anyone who, in all good faith, makes a disclosure which shows one of the following:

- That a criminal offence has been committed, is being committed or is likely to be committed. Further to the introduction of the Bribery Act 2010 this includes the provision of or accepting of bribes in order to gain to improve the prospects of gaining business, failing to prevent bribery or bribing a foreign official
- Fraud
- Financial mismanagement or corruption
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That the health and safety of an individual has been, is being or is likely to be endangered.
- That the environment has been, is being or is likely to be damaged.
- That information tending to show any matter within one of the preceding set of circumstances has been, is being or is likely to be deliberately concealed
- Concerns relating to product safety, quality & legality
- Concerns relating to authenticity and integrity (e.g. fraud)
- Concerns relating to sustainability incl human rights

The legislation covers internal disclosures to the employer and disclosures to prescribed regulatory bodies such as HMRC, the Financial Conduct Authority, the Health and Safety Executive, the Information Commissioner and Pensions Regulator.

No disciplinary action will be taken against those making a claim as listed above unless, after investigation it is judged that the disclosure was made for one of the reasons listed in 'Exclusions' at the bottom of this section.

The Company will protect, as far as is legally possible, the identity of the person making a disclosure. However, the employee against whom the disclosure is made will always be advised of the disclosure against them and will be given the opportunity to state their case before any decision is made or action taken.

If you are asked to attend a meeting during the course of an investigation into a disclosure, you will have the right to be accompanied either by a work colleague or trade union representative.

Any formal meetings conducted as part of the investigation of an allegation of malpractice will be handled in accordance with the disciplinary procedure.

The Whistleblowing Procedure should not be used for:

- Pursuing a personal grievance. Please refer to the Company's Grievance Procedure.
- Dealing with day to day problems, mistakes or general differences of view that arise at work. The normal practice is that you should raise these operational matters with your manager first and indeed everyone from time to time need help, constructive performance reviews to do their jobs well.
- You must not as a first step take your concerns to the press or the media.

1.2 Procedure

If you need to make a disclosure under this procedure, you should raise the issue as set out below, taking into account the seriousness and sensitivity of the issue and the staff involved:

- Send an email to hgcompanywhistleblowing@parkcity.co.uk with basic details of your concern

- A form will then be sent to you to complete with further relevant information that will be needed to investigate the claim

Disclosures will always be taken seriously, and the action taken may include one or several of the following:

- An internal or **external** investigation.
- An independent inquiry.
- A referral to the police.
- A referral to the Company's external auditors.
- **Records of the assessment/investigation, communications and any actions will be documented.**

Within 5 working days of a disclosure being received, the recipient will respond in writing to:

- Acknowledge receipt of the disclosure.
- Indicate the steps involved in dealing with the allegation made.
- Provide an approximate timescale to the actions necessary to conduct a full investigation into the allegations made.
- Indicate whether the employee will be required to take part in the investigation and, if so, what this will involve.
- Within 7 working days of a disclosure being received, the recipient must have begun an investigation to substantiate the allegation. On completion of the investigation a written report should be submitted to a Director.
- Within 5 working days of the completion of the investigation the Director will:
 - Write to the person making the disclosure, advising them of the outcome of the investigation and what, if any, further action will be taken.
 - Write to the employee(s) against whom the allegation is made advising them of the outcome of the investigation and what, if any, further action will be taken.
 - Initiate any further action that may be necessary as a result of the investigation.

The Company will not tolerate harassment, bullying or discrimination of anyone involved in, or the subject of, an investigation under these procedures.

Every effort will be made to keep your identity confidential, if this is your wish. However, where this may cause difficulties, e.g. if you are asked to give evidence, then you will be advised first, and available options will be discussed with you.

All records of disclosures and resulting investigations and actions will be confidential and kept in a secure location. Such records will only be used for internal monitoring purposes or to defend any legal action brought against the organisation.

1.3 Exclusions

You will not be protected under this procedure if:

- The disclosure does not come under one of the headings listed in under 'Principles' above;
- The disclosure is not made in good faith;
- The disclosure is made for personal gain;
- The disclosure is made to cause disruption to the Company;

and you will be subject to disciplinary action as a result.