



Whistleblowing Policy

Hartland Group Ltd is committed to the highest standards of openness and accountability. An essential aspect of accountability and transparency is providing a mechanism that enables staff and other members of the company to voice concerns responsibly and effectively.

If an individual discovers information indicating serious malpractice or wrongdoing within the organisation, they should disclose it internally without fear of reprisal. There should also be arrangements to ensure that such disclosures can be made independently of line management, except in relatively minor instances where a line manager would be the appropriate contact.

The Public Interest Disclosure Act provides legal protection to employees against dismissal or penalties for making public disclosures about serious concerns. Hartland Group Ltd endorses the provisions outlined below to ensure that no staff members feel disadvantaged when raising legitimate concerns.

This policy is intended to assist individuals who believe they have uncovered malpractice or impropriety. It is not designed to challenge financial or business decisions made by the company, nor should it be used to reconsider matters already addressed under grievance, disciplinary, or other procedures.

Scope of Policy

This policy enables employees to raise concerns internally at a high level and disclose information that they believe demonstrates malpractice or impropriety. These concerns may initially be investigated separately but could lead to invoking other procedures, such as disciplinary actions. Issues covered under this policy include, but are not limited to:

1. Financial malpractice, impropriety, or fraud
2. Failure to comply with legal obligations or statutory requirements
3. Health, safety, or environmental dangers
4. Criminal activity
5. Improper conduct or unethical behaviour
6. Attempts to conceal any of the above

Safeguards

1. Protection

This policy offers protection to employees of Hartland Group Ltd who disclose concerns, provided the disclosure is made:



- a) In good faith
- b) With the reasonable belief that it demonstrates malpractice or impropriety
- c) To an appropriate person as outlined below

No protection from internal disciplinary procedures is granted to those who choose not to follow this procedure. Malicious or unfounded allegations may result in legal action against the complainant.

2. Confidentiality

Hartland Group Ltd will treat all disclosures confidentially and sensitively. The identity of the individual making the allegation may be kept confidential unless it hinders or frustrates the investigation. However, the investigation process may require the individual to provide a statement as part of the evidence.

3. Anonymous Allegations

This policy encourages individuals to disclose their concerns with their names attached. Anonymous concerns may be considered at the company's discretion based on factors such as:

- a) The seriousness of the issue raised
- b) The credibility of the concern
- c) The likelihood of confirming the allegation through independent sources

4. Untrue Allegations

If an allegation made in good faith is not confirmed by subsequent investigation, no action will be taken against the complainant. However, if an individual makes malicious or vexatious allegations and persists in doing so, disciplinary action may be taken.

Procedures for Making a Disclosure

Any concerns should be reported to the designated investigating officer as follows:

1. Complaints of malpractice will be investigated by the appropriate Director unless the complaint involves the Director. In such cases, the complaint should be referred to the Managing Director.
2. If the complaint is connected with, but not against, the Director, the Managing Director will appoint a Senior Manager or external investigator.
3. Complaints against the Managing Director should be referred to the Chief Executive, who will nominate an appropriate internal or external investigator.
4. Employees have the right to bypass the line management structure and report their concerns directly to the Chief Executive.



If evidence of criminal activity is found, the investigating officer will inform the police while ensuring the company's internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of complaints, specific timescales for investigations cannot be guaranteed. The investigating officer must ensure that investigations are conducted promptly without compromising their quality.

As soon as practically possible, the investigating officer will:

- a) Acknowledge the complaint in writing
- b) Provide updates on the progress of the investigation
- c) Communicate the final outcome in writing, marked "confidential"

Investigating Procedure

The investigating officer will:

- a) Obtain full details and clarifications of the complaint.
- b) Inform the accused staff member as soon as practically possible, ensuring they are aware of their right to be accompanied by a trade union representative or colleague.
- c) Consider involving company auditors and/or the police if necessary, in consultation with the Director.
- d) Conduct a thorough investigation, seeking assistance from relevant individuals or bodies.
- e) Provide a written report on findings and recommendations to the Director.
- f) Implement appropriate disciplinary or corrective actions if the complaint is justified.
- g) Keep the complainant informed of the investigation's progress and outcome.
- h) Use investigation outcomes to review and improve company procedures if necessary.

If the complainant feels their concern is not being handled appropriately, they have the right to escalate the issue to the Director or a designated independent contact.

If an investigation finds the allegations unsubstantiated and all internal procedures are exhausted, but the complainant remains dissatisfied, Hartland Group Ltd acknowledges their right to make disclosures to a prescribed body (e.g., the Health and Safety Executive). A full list of prescribed persons and bodies is available on the Government Website (<https://www.gov.uk/>).