



## Company Policy Statement: **Whistleblowing Policy**

Portfolio: Governance and Assurance  
Portfolio Director: Mr Roger Clarke

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Chief Executive Officer	Mr Frank Lloyd-Murray	Wednesday, 21 June 2023

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Name	Business Area	Reason and Use
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# Section: 2 – The Policy Statement

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## What exactly is a Policy Statement?

A policy statement is an organization-level document that prescribes acceptable methods or behaviours. Essentially, a policy is simply the way things are done within an organization.

Policies are different from procedures and standard operating procedures because they are applicable to an entire organization and are primarily intended to set direction.



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## WHISTLEBLOWING POLICY STATEMENT

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible. This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, and agency workers.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Chief Executive Officer. 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. We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate.

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

We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistle-blowers must not suffer any detrimental treatment because of raising a genuine concern.

**You must not threaten or retaliate against whistle-blowers in any way.**

If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistle-blower could have a right to sue you personally for compensation in an employment tribunal. However, if we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

This policy will be regularly reviewed by GRAAY<sup>®</sup> Limited to ensure that they are adequate and continue to satisfy business requirements. This policy will be reviewed and updated as required at least but not limited to once every 12 months.

Signed as Approved this day, Wednesday, 21 June 2023

Signature

Position

**Mr Frank Lloyd-Murray**  
**Chief Executive Officer**

