Whistleblowing Policy

Introduction
Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work.
We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under our separate grievance procedure.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to the HR department for further advice.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.

Scope
This policy applies to all employees and workers employed by us. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow the procedure set out in this policy.

Whistleblowing concerns to which this policy relates
Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

Stage 1 - Raising a whistleblowing concern
If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise your concern with insert description of a more senior manager or the HR department.

You can raise your concern orally, or in writing.
It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR department may also be present.

Stage 2 - Responding to your whistleblowing concern
The manager to whom you raise your concern will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant manager will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing. Following the investigation, the relevant manager will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

Stage 3 - Appeal
If you are not satisfied with how your concern has been dealt with, you should appeal to the HR department. You can raise your appeal orally, or in writing. It is important that you set out clearly the grounds of your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR department may also be present.

The relevant manager will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

Confidentiality and anonymity
We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously.

We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

Our commitment to you
You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the HR department. In the alternative, you can raise it under our Grievance procedure if it applies to you.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

Raising your whistleblowing concerns externally
We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on GOV.UK).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

Further guidance
If you need further guidance or support, you can contact the whistleblowing charity Protect or Citizens Advice for free confidential advice.

Signed on behalf of the Lebus Board of Directors by:



Lisa Burrows
Head of People
Lebus Upholstery Ltd.

Date: 20.11.26