

Ref. No:	IMS-POL-09	<b>Whistleblowing Policy</b>	
Rev. Status:	03 JAN 20	(See QA-M-01)	

### **Whistleblowing Policy and Procedure**

The Company is committed to conducting the Company's business with honesty and integrity and the Company expects all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy is applicable to all employees, officers, consultants, suppliers, contractors, casual workers and agency workers.

### **What is Whistleblowing?**

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

### **How to Raise a Concern?**

The Company hopes that in many cases you will be able to raise any concerns with your Line Manager. However, where you prefer not to raise it with your Line Manager for any reason, you should contact the Chief Operating Officer.

The Company 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.

### **Confidentiality**

The Company hopes that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, the Company will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### **External Disclosures**

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. The Company strongly encourages you to seek advice before reporting a concern to anyone external.

Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

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### **Protection and Support for Whistle-blowers**

The Company aims 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 as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chief Operating Officer immediately.

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.

However, if the Company concludes 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.

#### **CONTACTS**

<b>Public Concern at Work</b> (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcau.co.uk">www.pcau.co.uk</a>
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Authorised by:



**Peter-Jon Cowe**  
Chief Operating Officer

**Date: 05<sup>th</sup> January 2026**

**Next Review Due: January 2027**