

HUBFORT

WHISTLEBLOWING POLICY

Policy Title	Whistleblowing Policy
Document Owner	Managing Director, HUBFORT
Applies To	All employees, contractors, directors and agents of HUBFORT
Effective Date	16 April 2026
Version	1.0
Review Cycle	Annual
Jurisdiction	United Kingdom

1. Purpose

HUBFORT is committed to conducting its business with honesty and integrity. This policy encourages workers to raise concerns about wrongdoing without fear of reprisal, and sets out how such concerns will be handled. It reflects the protections available under the Public Interest Disclosure Act 1998 (PIDA), which amended the Employment Rights Act 1996.

2. Scope

This policy applies to all workers including employees, directors, contractors, consultants, agency staff, volunteers, and job applicants. It also covers former workers who raise concerns about matters they learned of during their time with HUBFORT.

3. What Is a Whistleblowing Concern

Under PIDA, a 'qualifying disclosure' is one where the worker reasonably believes they are acting in the public interest and that the information tends to show one or more of the following:

- A criminal offence has been, is being, or is likely to be committed
- A breach of any legal obligation
- A miscarriage of justice
- A danger to the health or safety of any individual
- Damage to the environment
- Deliberate concealment of any of the above

Examples relevant to HUBFORT include bribery or corruption, fraud, tax evasion, data protection breaches, modern slavery or child labour in the supply chain, serious information security failings affecting clients, and breaches of financial or regulatory rules.

4. What Is Not Covered

Personal grievances such as pay complaints, bullying, harassment, or disciplinary matters affecting the individual raising them are usually not public interest disclosures and should be raised under the Grievance Policy. Where a concern has both elements, HUBFORT will decide in consultation with the person raising it which route is most appropriate; protections under this policy will apply to the whistleblowing element.

5. Protection for Whistleblowers

Workers who make a qualifying disclosure in accordance with this policy are protected from:

- Dismissal
- Disciplinary action
- Demotion or denial of promotion
- Reduction in hours, pay, or benefits
- Bullying, ostracism, or other detriment

Protection applies whether or not the concern turns out to be substantiated, provided the disclosure was made in good faith and with reasonable belief. Deliberately false or malicious disclosures are not protected and may be treated as a disciplinary matter.

Any worker who subjects a whistleblower to detriment will face disciplinary action up to and including summary dismissal.

6. Confidentiality

HUBFORT will treat all disclosures in confidence. The identity of the person raising a concern will not be revealed without their consent, save where:

- Disclosure is required by law (for example, in criminal proceedings)
- It is necessary to protect the person raising the concern or others from serious harm
- The person consents to disclosure to progress the investigation

Anonymous disclosures will be considered, but they are harder to investigate and the person cannot be updated on the outcome. Workers are strongly encouraged to identify themselves so concerns can be properly handled and protections applied.

7. How to Raise a Concern

7.1 Internal Channels

In order of preference:

- Line manager, if appropriate
- Managing Director, directly by email or private meeting
- A non-executive director, where the concern relates to the Managing Director or the executive team

Concerns may be raised verbally or in writing. Written concerns are preferred as they provide a clearer record but will never be required as a condition of protection.

7.2 What to Include

- The nature of the concern
- Dates, locations, and names where known

- Any documents or evidence available
- Whether the concern has been raised elsewhere

7.3 External Channels

Workers are encouraged to raise concerns internally first. However, the law recognises that external disclosure may be appropriate in some circumstances, and PIDA protections extend to disclosures made to certain prescribed persons, including:

- Information Commissioner's Office (ICO) for data protection concerns
- HM Revenue and Customs for tax concerns
- Serious Fraud Office for bribery and serious fraud
- Financial Conduct Authority for financial services concerns
- Health and Safety Executive for workplace health and safety
- Gangmasters and Labour Abuse Authority for modern slavery

The independent charity Protect (www.protect-advice.org.uk, 020 3117 2520) provides free, confidential advice to whistleblowers. HUBFORT encourages any worker who is unsure how to proceed to contact Protect.

8. How Concerns Will Be Handled

- Acknowledgement within five working days
- Initial assessment to decide how the concern should be investigated
- Appointment of an investigator independent of the concern
- Appropriate confidentiality and record-keeping throughout
- Interim update to the person raising the concern at least every 20 working days
- Written outcome summary at the end of the investigation, subject to legal and confidentiality constraints
- Referral to regulators, auditors, or law enforcement where required

The aim is to complete most investigations within three months; complex matters may take longer and the person raising the concern will be kept informed.

9. Records

A secure, confidential log of whistleblowing concerns and their outcomes is maintained by the Managing Director, with access restricted. The log is reviewed annually by the board as part of its governance oversight. Personal identifying information is removed where possible for reporting purposes.

10. Governance and Review

The board receives an annual report on the volume, nature, and outcome of whistleblowing concerns, and on the effectiveness of this policy. The policy is reviewed at least annually and updated where necessary. Changes are communicated to all staff.

11. Training and Awareness

- All staff are briefed on the policy on induction and annually
- Managers receive additional training on how to receive a concern and the protections that apply

- The policy is available on the intranet and referenced in the Employee Handbook

12. Responsibilities

- Board: sets the culture that welcomes challenge, receives the annual report, and acts on systemic issues identified
- Managing Director: policy owner, receives and triages concerns, appoints investigators, escalates appropriately
- Managers: recognise concerns raised with them, protect the worker, and route the concern without delay
- All workers: raise concerns in good faith where they see wrongdoing, and do not retaliate against those who speak up

13. Breach

Retaliation against a worker who raises a concern in good faith is a serious disciplinary matter and may amount to gross misconduct. Deliberately making a false or malicious disclosure is also a disciplinary matter.

14. Related Documents

- Anti-Bribery and Corruption Policy
- Code of Conduct
- Grievance Policy
- Disciplinary Policy
- Child Labour Policy
- Data Protection Policy

Approval

This policy has been reviewed and approved for release by the undersigned.

Approved By	Role	Date
Syed Ehsan	Managing Director	16 April 2026