



# Primary Goal

## Whistleblowing Policy

### Introduction and Purpose

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

This policy outlines the procedures around employees raising these types of concerns.

### Qualifying Disclosures

Certain disclosures are prescribed by law as “qualifying disclosures.” A “qualifying disclosure” means a disclosure of information that you genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure”:

- Committing a criminal offence, such as fraud or corruption.
- Failing to comply with a legal obligation or statutory requirement.
- A miscarriage of justice.
- Endangering the health and safety of an individual.
- Damage to the environment.
- Sexual Harassment, where you reasonably believe that such behaviour amounts to wrongdoing under whistleblowing legislation. This may include, for example, a breach of legal obligations under the Equality Act 2010 and failure to take reasonable steps to prevent harassment or the concealment of such conduct.
- Concealing any information relating to the above, or any other wrongdoing in the public interest.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. Primary Goal will take any concerns that you may raise relating to any of the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest.” We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Company's grievance policy. If a concern is raised under the whistleblowing policy but is not appropriate for that process – for example, if it relates to a personal grievance – the receiving manager will confirm that the matter will instead be handled in accordance with the grievance policy.

## **Procedure**

In the first instance you should report any concerns you may have to your line manager or a member of the senior leadership team. Where the concern relates to your line manager, or it is not appropriate to make the report to your line manager, you should report it to a member of the senior leadership team. All concerns reported will be treated in the utmost confidence. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

If you do not wish to report your concerns to a representative within the Company, you should take them directly to the appropriate organisation or regulatory body with authority for that area.

Following receipt of a disclosure made under this policy, an investigation manager will be appointed and a meeting will be held. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information, including relevant documentary evidence or witness statements.

Once the investigation is complete – whether this relates to the initial review of the concern or any further investigation that was required – the investigating manager will prepare a report outlining the findings and confirming whether any wrongdoing has occurred.

The report will include any recommendations, details of how the matter can be addressed, and whether a referral to an external organisation (such as the local authority or police) is necessary.

The investigating manager will inform you of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

If you are not satisfied with the explanation or outcome, you may escalate the matter to a member of the board or the appropriate official organisation or regulatory body.

## **Formal Action**

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

## **Protection Against Detrimental Treatment**

Everyone who raises matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

## **Review**

Primary Goal will continue to review the contents of this policy and review annually.