



## **Whistleblowing Policy Statement**

The Definition of Whistleblowing is the reporting of suspected misconduct, illegal acts, or failure to act, and it is often employees who are the first to realise that there is or may be something seriously wrong.

At INAL 2020 Limited whistleblowing is viewed as a positive act that can make a valuable contribution to our efficiency and long-term success. It is not disloyal to colleagues or to INAL 2020 Limited to speak up. We are committed to achieving the highest possible standards in all we do.

### **Aims and Objectives**

The aim of this Policy is to encourage employees who have serious concerns about any aspect at INAL 2020 Limited to come forward and voice those concerns.

The Policy is designed to ensure that employees can raise concerns about wrongdoing or malpractice within INAL 2020 Limited without fear of victimisation, subsequent discrimination, disadvantage, or dismissal.

It is intended to encourage and enable employees to raise serious concerns within INAL 2020 Limited, rather than ignoring the problem or 'blowing the whistle' externally.

The policy aims to:

- Encourage employees to feel confident in raising serious concerns at the earliest opportunity.
- Ensure employees receive a response to their concerns and that employees are aware of how to pursue them if they are not satisfied.
- Reassure employees that they will be protected from possible reprisals or victimisation if they have made a disclosure in good faith.

This Policy is intended to enable those who become aware of wrongdoing at INAL 2020 Limited affecting some other person to report their concerns at the earliest opportunity so that they can be properly investigated.

### **INAL 2020 Limited commitment to you**

INAL 2020 Limited is committed to good practice and high standards and to being supportive of its employee's.

INAL 2020 Limited recognises that the decision to report a concern can be a difficult one to make.

INAL 2020 Limited will not tolerate any harassment or victimisation of a whistleblower and will take appropriate action to protect employees that raise a concern in good faith. Any harassment or victimisation will be treated as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedures.



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### **INAL 2020 Limited support to you**

- Throughout this process employees will be given full support from senior management
- Employees concerns will be taken seriously; and
- INAL 2020 Limited will do all it can to help employees through any investigation

### **What should be reported?**

Employees should report any serious concerns they have, such as:

- Conduct which is an offence or a breach of law (a criminal offence that has been committed or failing to comply with any other legal obligation)
- Disclosures relating to miscarriages of justice
- Racial, sexual, disability or any other discrimination
- Health and safety of employees or anyone else who comes into our workplace
- Damage to the environment
- Unauthorised use of our assets, such as company credit card
- Possible fraud or corruption
- Neglect or abuse of colleagues or
- Any other unethical conduct

### **Making a disclosure**

Employees should normally raise concerns with:

- their immediate manager
- their department manager
- a director

Employees may make their disclosure in person, by telephone or in writing.

Employees will need to provide the following information:

- The nature of your concern and why they believe it to be true
- The background and history of the concern (with relevant dates)
- And any evidence they may have

Employees are not expected to prove the truth of their suspicion but will need to show to the person to whom the concern has been raised that they have a genuine concern related to suspected wrongdoing or malpractice and that there are reasonable grounds for their concern.





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### **What INAL 2020 Limited will do**

INAL 2020 Limited will respond to employees concerns as quickly as possible. To be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality i.e., not informing the subject of the complaint until or if it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Within 10 working days of a concern being raised, the person investigating the employee's disclosure will write to the employee:

- Acknowledging that the concern has been received
- Indicating how INAL 2020 Limited proposes to deal with the matter

### **Your legal rights**

This Policy has been written to take account of the Protected Disclosures Act 2014 which protects employees making disclosures. The Act makes it unlawful for INAL 2020 Limited dismiss anyone or allow them to be victimised as a result of making an appropriate lawful disclosure in accordance with the Act.

### **Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal an employee's identity if they wish to remain anonymous. If disciplinary or other proceedings result from the investigation, it may not be possible to take action as a result of an employee's disclosure without their help, so employees may be asked to come forward as a witness. If employees agree to this, they will be offered advice and support.

### **Anonymous disclosures**

This Policy encourages employees to make a named disclosure whenever possible. If employees do not identify themselves, it is much more difficult for the company to support the individual or give them feedback. Concerns made anonymously may be considered at the discretion of INAL 2020 Limited, considering:

- The seriousness of the issue raised
- The credibility of the concern and
- The likelihood of confirming the disclosure from other sources



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### Untrue Disclosures

If employees make a disclosure in good faith and believe it to be true, however it is not confirmed by an investigation it will be recognised as a genuine concern by INAL 2020 Limited.

If, however, employees make an allegation frivolously, maliciously or for personal gain appropriate action that may include disciplinary action may be taken.

A handwritten signature in black ink, appearing to read 'Michael Horan'. The signature is fluid and cursive, with a large initial 'M' and 'H'.

Michael Horan – Chief Executive Officer