



Whistleblowing Policy

Issued By/Contact: Chair of Audit Committee

1. Policy

The Osborne Group is committed to the highest standards of openness, integrity, accountability and transparency.

An important aspect of accountability and transparency is a mechanism to enable you to voice concerns in a responsible and effective manner.

The policy applies to all individuals engaged by the Company including directors, employees, consultants, contractors, temporary and agency workers.

You may be the first to know when something illegal or improper occurs but may be worried about voicing these concerns.

We are committed to dealing with any genuine concerns that you may have about suspected misconduct and the pursuit of these concerns to a clear conclusion.

Any misconduct or malpractice should be reported including, but not limited to, the following:

- Criminal activity
- Miscarriages of justice
- Falsification of financial or other records
- Instances of fraud, bribery or corruption
- Failure to comply with a legal, professional or regulatory obligation

- Danger to health or safety
- Damage to the environment
- Breaches of our policies and procedures
- Conduct likely to damage our reputation
- Conflicts of interest
- Actions intended to conceal any of the above

The policy is primarily for concerns where the interests of others or of the Company itself are at risk. So if you are in any doubt, raise it.

2. What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected misconduct, malpractice, wrongdoing or dangers at work. All organisations face the risk of unknowingly harbouring illegal or unethical conduct, and need staff to alert them when they realise that there is something wrong that needs to be addressed.

Whistleblowing encourages and enables you to raise serious concerns within the Company without fear of reprisals, victimisation or feeling that speaking up would be disloyal to colleagues or us.

3. Aim of the Policy

- Is to encourage you to feel confident in raising concerns and to question and act upon concerns about practice
- Is to provide avenues for you to raise concerns in confidence and receive feedback on any action taken
- Is to ensure that you to receive a response to concerns and that



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- you are aware of how to pursue them if you are not satisfied
- Is to reassure you that you will be protected from possible reprisals or victimisation if a reasonable belief that a disclosure has been made in the public interest

4. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the whistleblower. At the appropriate time, however, you may need to come forward as a witness.

However, we encourage you to put a name to the concern whenever possible.

Please note that:

- You must disclose the information in the public interest
- You must believe it to be substantially true
- You must **not** act maliciously or make false allegations
- You must **not** seek any personal gain

5. Procedure

5.1 How to raise a concern

In the first instance, it is expected that a concern would be raised with your line manager. This may be done in person or in writing.

If, for whatever reason, it is impractical to approach your line manager, or if the concern is not being progressed, contact should be made with your People Team representative, or the Group Finance Director, or the Chair of the Audit Committee.

Concerns can be investigated even if you prefer to remain anonymous but this will make the progression of the investigation and providing feedback much harder.

If at any stage you experience reprisal, harassment or victimization for raising a genuine concern, please contact Sarah Taylor, Group People Director.

5.2 Progressing concerns

Once notified of a concern we will investigate it carefully and thoroughly to assess what action, if any, should be taken. Depending on the nature of the concern an internal inquiry or a more formal investigation will be undertaken. Points of contact will be established together with any details of any further information required from the complainant. Any personal interest in the matter should be declared at the outset.

We will provide as much feedback as possible to you, however specific details may have to be withheld as these could infringe the privacy of another individual.

5.3 Contacting external regulators

Terms and conditions of employment require that confidential, false or misleading information is not disclosed. In considering taking a concern outside of the Company, you should be aware of this duty of confidentiality and consider whether reporting the concern externally, without first giving us the opportunity to look into the matter, is the reasonable course of action.

This policy is intended to give the reassurances necessary to raise concerns internally, but if concerns still exist, we would rather they are raised with the appropriate regulator than not at all. Providing the action is being carried out in



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the public interest and evidence exists to back up any concerns, available contacts include:

- Health and Safety Executive
- Rail Regulator
- Environment Agency
- Office of Fair Trading

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5.4 Independent Advice

The independent whistleblowing charity, Public Concern at Work offer free, confidential advice. They also have a list of prescribed regulators for reporting certain types of concern. We strongly encourage you to seek advice before reporting a concern to anyone externally.

6. Communication

The Policy will be communicated to everyone via our Website and internally through policy hub.

7. Contacts

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