



Whistleblowing Policy

PT-CP-340

Issued By/Contact: Group People Director

You MUST contact your People team representative before any action is to be taken under the policy

1. Policy

Osborne and its subsidiary companies are committed to the highest standards of quality, openness and integrity alongside probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable employees or other workers engaged by the Company to voice concerns in a responsible and effective manner.

Employees or other workers engaged by the Company may be the first to know when something illegal or improper occurs but may be worried about voicing these concerns.

The Company is committed in dealing with any genuine concerns that employees or other workers engaged by the Company may have about suspected misconduct and the pursuit of these concerns to a clear conclusion.

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but any of the following may be reported:

- Criminal offences being committed

- Failure to comply with a legal obligation
- Actions which endanger the health or safety of employees or the public
- Actions which cause damage to the environment
- Actions which breach the Company's policies or could damage the reputation
- Actions which are intended to conceal any of the above

The policy is primarily for concerns where the interests of others or of the organisation itself are at risk. So if an employee or other workers engaged by the Company is in any doubt, raise it.

2. What is Whistleblowing?

Employees or other workers engaged by the Company are often the first to realise that there is something seriously wrong that needs to be addressed.

Whistleblowing encourages and enables employees or other workers engaged by the company to raise serious concerns within the Company without fear of reprisals, victimisation or feeling that speaking up would be disloyal to colleagues or the Company

3. Aim of the Policy

- Is to encourage employees or other workers engaged by the Company to feel confident in raising concerns and to question and act upon concerns about practice



POLICIES & STATEMENTS



- Is to provide avenues for employees or other workers engaged by the Company to raise concerns in confidence and receive feedback on any action taken
- Is to ensure that employees or other workers engaged by the Company receive a response to concerns and that they are aware of how to pursue them if they are not satisfied
- Is to reassure employees or other workers engaged by the Company that they 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, the employee or other workers engaged by the Company may need to come forward as a witness.

However, the policy does encourage the employee or other workers engaged by the Company to put a name to the concern whenever possible.

Please note that:

- Employees or other workers engaged by the Company must disclose the information in the public interest
- Employees or other workers engaged by the Company must believe it to be substantially true
- Employees or other workers engaged by the Company must

not act maliciously or make false allegations

- Employees or other workers engaged by the Company 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 the employees or other workers engaged with the Company line manager. This may be done in person or in writing.

If, for whatever reason, it is impractical to approach the line manager, or if the concern is not being progressed, contact should be made with the Company Secretary.

Concerns can be investigated even if the employee or other workers engaged by the Company prefer to remain anonymous but, as per section 4, this will make the progression of the investigation and providing feedback much harder.

5.2 Progressing concerns

Once notified of a concern the Company 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. Whilst as much feedback as possible will be given 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, employees or other workers engaged by the Company should be aware of this duty of confidentiality within section 4 and consider whether reporting the concern externally, without first giving the Company the opportunity to look into the matter, is the reasonable course of action.

The policy is intended to give the reassurances necessary to raise concerns internally, but if concerns still exist, the Company would rather a concern be raised with the appropriate regulator than not at all. Providing the action is being carried out in 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

6. Responsibility

The Group Finance Director alongside the Group People Director will be the lead roles within the Company and for the review and administration of the policy.

7. Communication

The Policy will be communicated to all employees or other workers engaged by the Company with updates issued as and when required through policy hub.

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