

1.0 Statement

Vertex Services Group aims, at all times, to conduct its business with the highest standards of integrity and honesty.

However, it is not unusual for an employee to occasionally express concern about an employment or operational practice. These concerns are normally resolved through the Company's grievance procedure.

There may be occasions where an employee considers a matter that has occurred or may occur to be so serious, (dangerous, corrupt or illegal) that it may be a danger to the employee, the company, the environment, suppliers and customers, or even the general public.

In such circumstances he or she may find it necessary to disclose the matter to an outside body. This action is known as **Whistleblowing** and employees have some statutory protection where they are involved in this activity.

The Public Interest Disclosure Act 1998 provides protection to employees who report wrongdoing within the workplace.

2.0 Aim

Open communication is promoted within the Company and all employees are encouraged to report any wrongdoing by the Company or its employees.

The aim of this policy is to ensure that employees are confident that they can raise any matter (excluding employment issues which should be handled through the grievance procedure) that genuinely concerns them, in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.

If you have any concerns at all about wrongdoing at work, including

- any criminal offence
- a failure to comply with legal obligations
- a miscarriage of justice
- a health and safety danger
- an environmental risk
- or a concealment of any of these
- an act of bribery

You are able to raise these concerns using any of the internal or external

reporting options detailed below

3.0 Internal Reporting Options

Where an employee has a concern about any malpractice or wrongdoing, he or she can raise the matter immediately with their direct **line manager**. This can be done orally or in writing.

The **line manager** will investigate the matter that has been raised, and where appropriate take any corrective actions, and feedback any relevant outcomes to the individual raising the issue. This will, hopefully, conclude the matter.

Where the employee does not find the outcome to the matter satisfactory; or where the individual considers the matter to be of such magnitude; he or she considers it inappropriate to raise the matter with his or her line manager; he or she should raise the matter with a more **senior manager**. This can be done orally or in writing.

The senior manager will investigate the matter that has been raised, and where appropriate take any corrective actions, and feedback any relevant outcomes to the individual raising the issue. This will, hopefully, conclude the matter.

Where the employee does not find the outcome to the matter satisfactory; or where the individual considers the issue to be of such magnitude; he or she considers it inappropriate to raise the matter with a senior manager; he or she should raise the matter with the **Director**. This can be done orally or in writing.

The **Director** will investigate the matter that has been raised, and where appropriate take any corrective actions, and feedback any relevant outcomes to the individual raising the issue. This will, hopefully, conclude the matter.

In all cases the designated person to whom the matter has been reported to will treat the issue as completely confidential and will not report it to anyone within the Company unless the individual reporting the matter agrees. During investigations every effort will be made to preserve the anonymity of the employee raising the concern.

The designated person may of course raise any matter they feel to be significant to the Managing Director during the investigation.

In all cases the designated person to whom the matter is reported to will advise the individual raising the matter within 5 days of who has been appointed to head up the investigation and whether further information is

needed. The Company will provide details of the outcome with 21 days or will provide notification of a longer period if required.

Individuals should be aware that it may not be possible to disclose details of all the actions taken and their precise impact as they could infringe upon statutory regulations or the Company's duty of confidence.

The Company undertakes that no employee who makes a *bone fide* report under these options will be subjected to any detriment as a result.

In the event that you believe you are being subjected to a detriment by any person within the Company as a result of your decision to invoke the procedure, you must inform the Managing director or the Non-Executive Director and appropriate action will be taken to protect you from any reprisals.

If it should become clear that the reporting options have not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee, this may constitute misconduct and will be dealt with in accordance with the Company's disciplinary procedure.

4.0 External Reporting Options

Whilst the Company is hopeful that all such matters will be satisfactorily dealt with through internal reporting options it is recognised that an employee may feel so strongly about an issue, either in its substance or in its handling, that he or she may consider it appropriate to raise it with an outside body such as the police, Health & Safety Executive, Environment Agency, Financial Services Authority etc.



Wayne Tantrum
Managing Director
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