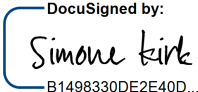
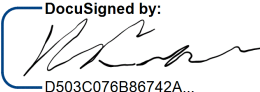
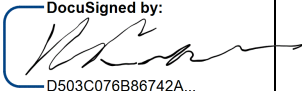




WHISTLEBLOWING POLICY

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WHISTLEBLOWING POLICY



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WHISTLEBLOWING POLICY



1.0 POLICY STATEMENT

This Policy defines our commitment to encourage a culture of openness within ICR Integrity Limited, (“the Company”) enabling all individuals to raise issues which concern them at work, with the aim of preventing bad practice. All organisations face the risk of things going wrong or of unknowingly enabling bad practice, and the Company has a duty to identify malpractice and take the appropriate measures to remedy the situation.

With the introduction of the Public Interests Disclosure Act 1998, all individuals now have legal protection from any form of retribution, victimisation or detriment as a result of publicly disclosing certain serious allegations of bad practice. This policy is designed to give individuals that opportunity and protection when making a complaint or assisting in an investigation without fear of reprisal.

2.0 SCOPE

This Policy provides uniform guidelines for all ICR employees, contractors and associates of the Company (collectively referred to as “individuals” throughout this policy) who wish to make a disclosure in connection with their employment. Some language and legislation may differ across various legal jurisdictions. For clarity, this Policy applies to all ICR locations. Throughout this Policy, the term ‘we’, ‘ICR’, ‘ICR Integrity’, ‘ICR Integrity Group’, ‘our’, ‘us’ ‘Company’ refers to ICR Integrity Group Limited and/or any of its subsidiaries.

3.0 RESPONSIBILITIES

The Leadership Team has a responsibility to ensure that disclosures are dealt with as fairly and quickly as possible and as near to the point of origin as possible.

3.1 COMPANY COMMITMENT

- All issues raised under this Whistleblowing Policy will be dealt with appropriately, consistently, fairly and professionally.
- You may be asked to provide further information during the course of any investigation.
- You must inform ICR immediately if you do not wish anyone else to know it was you who raised the concern.
- The Company will undertake to protect the identity of the worker raising the disclosure, unless required by law to reveal it and to offer support throughout with access to mentoring, advice and counselling.
- Will provide feedback to the worker who raised the disclosure and where possible and appropriate, subject to other legal requirements.
- Feedback will include an indication of timings for action or next steps although you will have no say in how your concern is dealt with.

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4.0 POLICY

Whistleblowing is the term used when a worker passes on information concerning wrongdoing. This can be called “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessary) be something they have witnessed at work.

To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means that personal grievances and complaints are not usually covered by whistleblowing law and should be handed through the Company’s Grievance Standard.

This policy will apply in cases where an individual genuinely and in good faith believes that one of the following sets of circumstances is occurring, has occurred or may occur within the Company:

- That a criminal offence has been committed, is being committed or is likely to be committed e.g., fraud, financial mismanagement or corruption
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject e.g., Data Protection Act
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health and safety of any individual has been, is being or is likely to be endangered
- That there has been a failure to investigate allegations of discrimination or harassment
- That the environment has been, is being or is likely to be damaged
- That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

While it is not necessary that the individual proves the malpractice or misconduct that they are alleging but may simply raise a reasonable suspicion. Please note that an individual will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence. Individuals will only be entitled to protection if the disclosure is carried out in accordance with the procedure in good faith.

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest. These grievances are reportable under the ICR Grievance Standard (ICR-BMS-02-HE-STA-030).

5.0 WHO THE DISCLOSURE SHOULD BE RAISED TO?

If an individual wishes to raise or discuss any issues which might fall into the above category, they should contact their Line Manager in the first instance who will treat the matter in confidence. In such cases it is likely that further investigation will be necessary, and they may be required to attend a disciplinary or investigative hearing

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as a witness. The complaint should be made orally or in writing, describing the incident(s) as fully as possible to their Line Manager. Where the concern involves the individual's Line Manager then the concern should be raised with a member of the Leadership Team. All complaints will be viewed seriously and treated confidentially.

Any Line Manager who has a matter or issue raised to them by an individual, must contact one of the internal designated contacts noted within section 9.0 of this policy.

6.0 RAISING DISCLOSURES EXTERNALLY (EXCEPTIONAL CASES)

The main purpose of this policy is to give individuals the opportunity and protection they need to raise their concerns internally. The Company fully expects that in almost all cases raising concerns internally will be the most appropriate action for individuals to take.

However, if for whatever reason, an individual feels that they cannot raise their concerns internally and honestly and reasonably believes the information and any allegations are true, they should consider raising the matter with the enforcing Government or relevant legal / regulatory body. Additionally, the enforcing Government or relevant legal / regulatory body should be contacted if the individual feels they have an interest in the matter and, despite the best efforts of the Company, the individual believes that disclosure within the Company is inappropriate or has been unsuccessful. Disclosures made to the individual's legal advisor in the course of obtaining legal advice will be protected.

Alternatively, if an individual has good reasons for not using the internal or regulatory disclosure procedures described above, they may consider making a wider disclosure by reporting the matter to the police or to the media, for example. While the Company very much respects the right of individuals to raise issues externally, they are strongly recommended to take legal advice / citizens advice bureau advice to ensure they are fully protected.

Individuals may not participate in any press interviews or discussions nor provide copy in the form of letters or articles regarding any aspect of the Company business without first obtaining written permission. Any such interviews must be held in the presence of a member of the Leadership Team. Where an individual is protected by legislation, the process outlined in this general policy should apply and it is not intended that any restrictions on press interviews or discussions should negate any rights that an individual may have under that legislation.

7.0 DISCLOSURES MADE IN BAD FAITH

Individuals should be aware that the policy will apply where a disclosure is made in good faith and where an individual reasonably believes that the information disclosed, and any allegation contained in it are substantially true. If any disclosure is made in bad faith (for instance, in order to cause disruption within the Company), or concerns information which the individual does not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the

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Company's Disciplinary Standard (ICR-BMS-02-HR-STA-029) and may constitute gross misconduct for which summary dismissal may result.

While the Company hopes that such disclosures will never be necessary within its organisation, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.

8.0 PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform Katie Francis, HR Manager immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

9.0 CONTACTS

HR Manager	Katie Francis +44 (0)1224 977056 Katie.Francis@icr-world.com
CFO	Alan McQuade +44 (0)1224 977 049 Alan.McQuade@icr-world.com
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 3117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk