



**Global Procurement Group Limited
Whistleblowing Policy
v2.1 October 2021**

Version Control

Effective Date	Version	Changes	Author(s)
Mar 2021	-	Introduction of version control page	Kelly Convery
Mar 2021	2	Updated Company Name. Updated Introduction. Removed the enquiries@ email address. Kept it as HR only in clause 3.6. Added in clauses 4, 5, and 6. Updated wording in clause 7.	Kelly Convery and the Legal team
1 st Oct 2021	2.1	Updated clause 3.2. Added in clause 4.2. Added in clause 5. Added in clause 6.3 – 6.5. Updated 'HR Team' to 'People Team'.	Kelly Convery and the Legal team



1. Introduction

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, Employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information. For the purposes of this policy, "Employees" refers to all employees, officers, consultants, contractors, casual workers and agency workers of Global Procurement Group Limited and any of its subsidiaries from time to time ("the Company").

However, the law allows Employees to make a 'protected disclosure' of certain information, known as whistleblowing. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the Company's activities. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the Employee making the disclosure, is made in the public interest.

The Company actively encourages a culture of honesty and openness and therefore all Employees are required to bring up to their manager or other designated person any issue that, in the Employee's opinion, might constitute bribery or corruption.

For those Employees who are based outside of the UK, should there be any conflict between this policy and a local law, or any location-specific Whistleblowing Policy put in place by the Company (or any subsidiary) from time to time, the local law or location specific policy shall take precedence over this policy.

2. Specific subject matter

2.1 If, in the course of employment, an Employee becomes aware of information which they reasonably suspect tends to show one of more of the following:

- 2.1.1 that a criminal offence has been committed is being committed or is likely to be committed;
- 2.1.2 that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- 2.1.3 that a miscarriage of justice that has occurred, is occurring, or is likely to occur;
- 2.1.4 that the health or safety of any individual has been, is being, or is likely to be, endangered;
- 2.1.5 that the environment, has been, is being, or is likely to be, damaged;
- 2.1.6 that information tending to show any of the above, is being, or is likely to be, deliberately concealed;
- 2.1.7 that the business or any associated person has been, is being, or is likely to be receiving or offering bribes; or
- 2.1.8 that any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the Company or any associated person.

they must use the Company's disclosure procedure as set out below.

3. Disclosure procedure



- 3.1 Information which an Employee reasonably believes tends to show one or more of the above should promptly be disclosed to the Employee's manager, or a member of the People team so that any appropriate action can be taken.
- 3.2 If it is inappropriate to make such a disclosure to the manager, the Employee should contact:
 - 3.2.1 the People team; or
 - 3.2.2 Safecall, an independent external organisation.
- 3.3. Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.
- 3.4 However, failure to follow this procedure may result in the disclosure of information losing its 'protected status'.
- 3.5 For further guidance in relation to this matter or concerning the use of the disclosure procedure Employees can speak in confidence to the People team at people.team@ngpltd.co.uk.

4. Confidentiality

- 4.1 The Company hopes that Employees will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. However, if Employees want to raise their concern confidentially, the Company will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the Employees concern.
- 4.2 The Company does not encourage Employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Company cannot obtain further information from the Employee. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the People team or one of the other contact points listed in clause 3 and appropriate measures can be taken to preserve confidentiality. If Employees are in any doubt, they can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline.

5. Investigation and Outcome

- 5.1 Once an Employee has raised a concern, the Company will carry out an initial assessment to determine the scope of any investigation. The Company will inform the Employee of the outcome of the assessment. The Employee may be required to attend additional meetings in order to provide further information.
- 5.2 In some cases, the Company may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Company to minimise the risk of future wrongdoing.
- 5.3 The Company will aim to keep the Employee informed of the progress of the investigation and its likely timescale. However, sometimes need for confidentiality may prevent the Company from giving the Employee specific details of the investigation or any disciplinary action taken as a result. The Employee should treat any information about an investigation as confidential.

6. External Disclosures



- 6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases Employees should not find it necessary to alert anyone externally.
- 6.2 The law recognises that in some circumstances it may be appropriate for Employees to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. The Company strongly encourage Employees to seek advice before reporting a concern to anyone external.
- 6.3 The Company operates an open reporting culture, and has engaged the services of Safecall, an external organisation that allows an independent and confidential route for concerns to be reported.
- 6.4 Concerns can be reported to Safecall online via www.safecall.co.uk/report or by telephoning 0800 915 1571.
- 6.5 Safecall will pass details of any reported concern to the People Director and/or the Chief People Officer. Together they will determine what next steps should be but generally they will appoint someone to investigate the concern in accordance with clause 5.

7. Protection and Support for Whistleblowers

- 7.1 The Company aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 7.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If Employees believe that they have suffered any such treatment, they should inform a member of the People team immediately. If the matter is not remedied, they should raise it formally using the Company's Grievance Procedure.
- 7.3 Employees must not threaten or retaliate against whistleblowers in any way. If Employees are involved in such conduct, they may be subject to disciplinary action.
- 7.4 However, if the Company conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

8. Review of policy

The Company reserves the right to review and amend this policy from time to time.

This policy and procedure has been approved and authorised by:

Name: Scott High

Position: People Director

Signature: