

# Whistleblowing POLICY

Policy: GRC001 - Whistleblowing

Owner: Board

Version: GRC001 v1

Published Date: 23/12/2022

Next review: 22/12/2025



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## 1. Policy Statement

At Delamode, we are committed to conducting our business with Employees, customers, suppliers, and shareholders in a lawful and ethical manner. We believe this will encourage and maintain the highest possible standards of work ethics, including honesty, openness, and accountability.

All Employees, officers, consultants, contractors, graduates, casual and agency workers (referred to here as a “**Employee**”) are required to act in an ethical and honest way in all business matters, and are required to comply with this Policy, the Delamode Code of Conduct, the Anti-Bribery & Corruption, incorporating Gifts and Hospitality and all other policies setting out standards of conduct required from our Employees.

We recognise that Employees are often the first to recognise when these standards are not being met. Employees are therefore encouraged to report any concerns about the behaviour of Delamode or our Employees that falls short of these key business principles.

‘Whistleblowing’ is viewed by the Delamode as a positive act that can make a valuable contribution to our work processes, the engagement and safety of our people, and ultimately, to our long-term success. It is not disloyal to employees or the Company to speak up if they see something that concerns them as the Company is committed to operating at the highest possible standards of service and ethical standards, in business and public, in all its practices.

## 2. Purpose

The purpose of the Whistleblowing Policy is to:

- **clarify** what Whistleblowing is; and
- **explain** what Employees (in the broadest sense) are required to do, and how, and to whom, concerns should be reported.

## 3. Objectives

The Policy objectives are to:

- **provide** an open and protected environment for concerns to be raised, investigated, and properly addressed, without fear of reprisal, criticism, or discrimination.
- **give assurance** of our commitment and support for Employees to make fair and prompt disclosure of events or circumstances where a Employee believes that Delamode or another Employee is involved, and which should be disclosed, by appointing a dedicated Whistleblowing Officer (Delamode DFO); and
- **provide** Employees with the confidence to report any genuine concerns and voice worries at an early stage, confidentially, and without fear of repercussion or retaliation, even if they turn out to be mistaken.

By promoting and supporting this Policy, we want to encourage open and honest communication to ensure Delamode operates its business ethically and with integrity.



#### 4. What is Whistleblowing?

In the context of this Policy, Whistleblowing, is the reporting of (or the disclosure of information that relates to) suspected malpractice, wrongdoing, danger or breaches of policy or regulations in relation to Delamode's business activities and the conduct of those activities.

Examples of areas of concern are listed below in **Notifiable Concerns**, however this list is not exhaustive. If there is a concern which is not specifically listed, Employees still have a duty to make a report in line with the procedure below.

How to raise a concern is detailed in **Appendix 2** and **Appendix 3** of this policy.

Who can raise a concern under this Policy?

The Policy applies to all:

- Employees of Delamode (and associated companies)
- Employees of contractors working for Delamode (e.g., agency staff)
- Employees of suppliers
- those providing services under a contract or other agreement with the Company

Third parties, who do not have access to this policy are directed to the corporate website and our whistleblowing statement.

#### 5. Notifiable Concerns

All Employees must report in good faith, in a timely manner and without prejudice, any legitimate concerns or suspicions listed below:

- any criminal offence/act that has been or is likely to be committed (for example fraud, corruption, bribery, extortion, or any other financial irregularity).
- any breach or intended breach of a legal or professional obligation (contractual or civil).
- any breach or intended breach of a Delamode Policy or procedure.
- any act or action that could jeopardise the health, safety, human rights or well-being of a person or group of people.
- any act that could damage, or is damaging, the environment.
- Any act that could be perceived as ethically wrong or below expected company standards
- deliberate concealment of any information relating to any of the above.

You may have concerns that are not listed above: if you are unsure whether to report them, you should always follow the procedure set out in this Policy and make a report or seek guidance from the Whistleblowing Officer.

#### 6. What is not covered by this policy?

Whistleblowing is the disclosing of information about actual wrongdoing; it is not a forum for making unfounded allegations.



## 7. Reporting to third parties

In most cases Employees should not find it necessary to alert anyone externally; however, the law does recognise that in some circumstances it may be appropriate for you to report your concerns to an external body.

## 8. Confidentiality, Support and Protection of Employees

Delamode recognises the concerns and sensitivities of raising such issues, and when requested to do so, will protect the identity of the Employee who has reported the matter and treat details of the investigation with the utmost confidence.

Any Employee who believes that they have suffered detrimental treatment because of raising a concern should inform the Whistleblowing Officer.

Any attempt by anyone within Delamode to deter, threaten or seek to bribe a Employee to prevent or discourage them from making a report, or any victimisation of a Employee because they have made a report, will be treated as a serious disciplinary offence, and may lead to dismissal or further appropriate action

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for the Company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Throughout this process:

- you will be given full support from senior management
- your concerns will be taken seriously, and
- the Company will do all it can to help you throughout the investigation

If appropriate, the Company will consider temporarily re-deploying you for the period of the investigation.

For those who are not Company Employees, the Company will endeavour to provide appropriate advice and support wherever possible.

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to act as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be considered would include:



- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

## 9. Outcome of Investigations

The Employee will be advised of the outcome of the investigation as soon as practicable. The level of detail provided will be subject to the constraints of the Company's duty of confidentiality or any other legal constraint.

Reports and recommendations will initially be received and reviewed by the Chairman in their capacity as Whistleblowing Officer. The Whistleblowing officer is member of the board and is independent of direct operational control.

Based on the findings, recommendations for actions will be made to the CEO or another relevant and / or appropriate Senior Manager and managed through to resolution under supervision of the Delamode Group board

In certain circumstances, such as criminal activity, the matter will be notified to the relevant external bodies with the remit and authority to deal with the matter and take the appropriate actions. Delamode will fully cooperate with all external bodies to the extent required.

Regardless of the outcome of any investigation, all concerns reported under the Whistleblowing Policy will be reported to the Delamode group Board of Directors.

## 10. Communications with Employees

The level of contact with the disclosing Employee will depend on the nature and severity of the concern reported, and the clarity of the information provided. We may need to contact you for further information.

If you are not happy with the way a concern has been handled, you can raise it with the Chairman, via the board.

The Company will ensure the disclosing Employee is not subject to any form of harassment, discrimination, or any other detrimental effect because of making a report, if their identity is known.

## 11. Further Advice

If you are not sure how to proceed or wish to discuss any aspect of this Policy, you should contact the Whistleblowing Officer by email at [corporateCompliance@delamode-group.com](mailto:corporateCompliance@delamode-group.com)

or at the following address:

PRIVATE & CONFIDENTIAL  
Delamode limited  
Attention: The Whistleblowing  
Officer 700 Avenue West, Skyline 120  
Braintree, Essex  
CM77 7AA



## 12. Associated Policies

- The Code of Conduct
- Anti-Bribery & Corruption Policy, incorporating Gifts and Hospitality
- Grievance Policy, procedure, and associated documents
- Dignity at Work (Bullying & Harassment) Policy
- Document retention (see point 14)

## 13. Relevant legislation

Public Interest Disclosure Act 1998

<https://www.legislation.gov.uk/ukpga/1998/23/section/1>

Employment Rights Act 1996

## 14. Document Retention period

- Original Whistleblowing correspondence (i.e., emails are retained for 3 years post issuance of the final report).
- Investigation evidence is retained under the Internal Audit working paper retention periods of 3 years from issuance of the final report

Document Control	
Function Owner	Central Finance
Policy Owner	Delamode central finance team and Risk
Policy Approval Route	CEO
Published date	23/12/2022
Version Number	1
Effective date	23/12/2022
Next review date	22/12/2025

Version History	
Key Changes	Effective Date
Initial launch	23/12/2022



## Appendix 1: Policy responsibilities

### Management/ Directors Must:

- Read, understand, and follow the principles in this Policy and any associated documents.
- Keep up to date with changes to this Policy and any associated documents.
- Treat any reports made to them seriously, confidentially and report them immediately to the Whistleblowing Officer.
- Investigate reports thoroughly when requested or authorised to do so.
- Respect an Employee's right to anonymity if requested.
- Ensure there are no unnecessary delays concluding an investigation; and
- Ensure the disclosing Employee is not subject to any form of harassment, discrimination, or any other detrimental effect because of making a report.

### Employees Must:

- Read, understand, and follow the principles of this Policy and any associated documents.
- Seek clarification on any points which are unclear.
- Make any legitimate report which they believe falls under this Policy; and
- Act in good faith when making a report.

### HR Teams Must:

- Read, understand, and follow the principles of this Policy and any associated documents.
- Support all Employees when using this, Policy.
- Monitor the application of this Policy to ensure fairness and consistent treatment; and
- Advise the Whistleblowing Officer if they believe updates are required to the Policy.

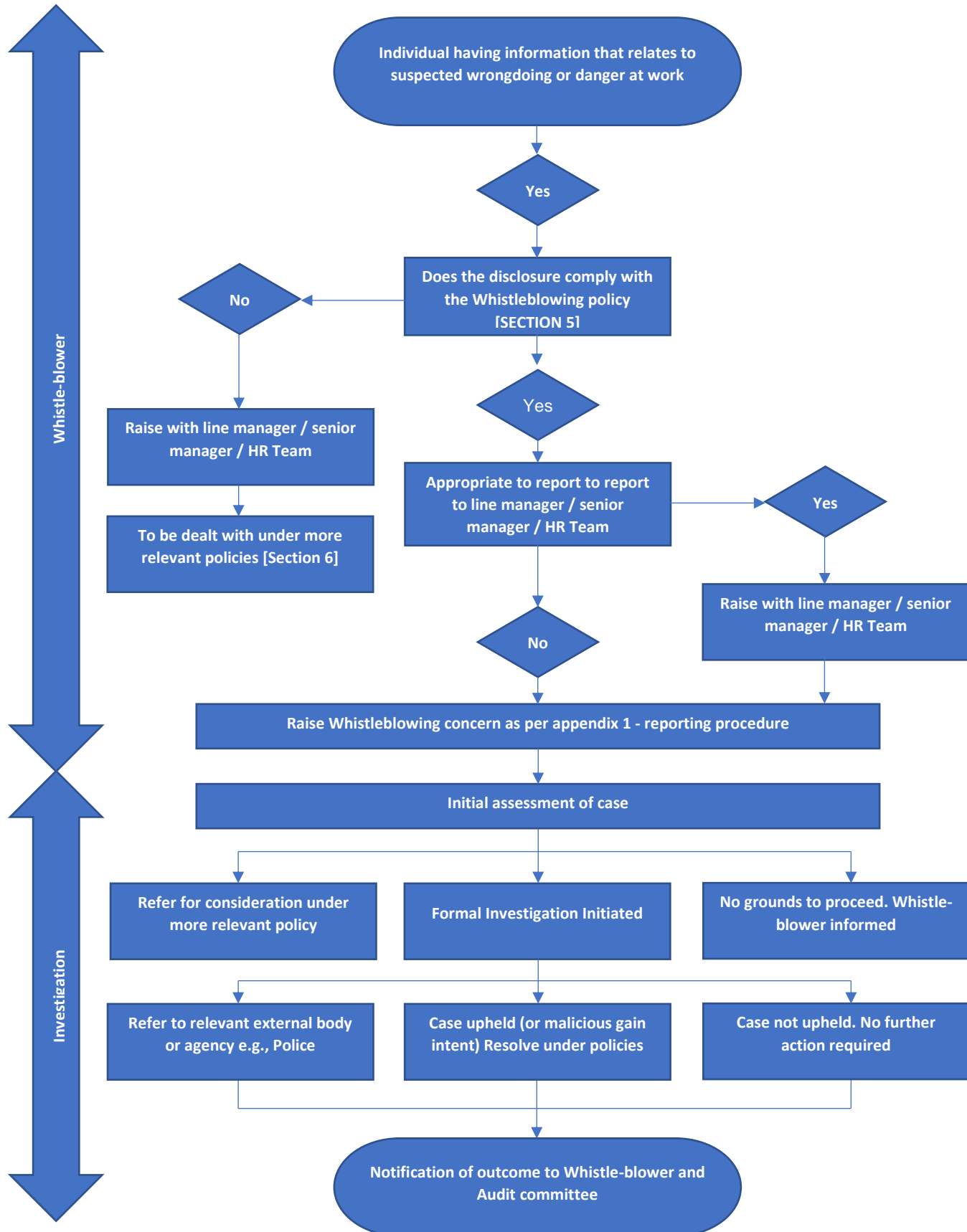
### Whistleblowing Officer Must:

- Read, understand, and follow the principles of this Policy and any associated documents.
- Investigate all reports in accordance with this Policy and the Procedure within; and
- Maintain a Whistleblowing Register and advise the Delamode Group Board of Directors of all reports made under this Policy.





### Appendix 2: Whistleblowing Process flowchart





### Appendix 3: Procedure for reporting a concern

Employees must raise any concerns through the procedure detailed within this Policy.

If a Employee is obliged, or is unsure whether to report a concern, they should do so as soon as they become aware.

Every report will be treated seriously and will be fully investigated. It is the responsibility, on receipt of a report, of the person notified of a concern to forward this to the Whistleblowing Officer. The Whistleblowing Officer will then be responsible for allocating appropriate resources at the appropriate level for a full investigation to take place.

#### Reporting Procedure

In the first instance a Employee should report their concern to their Line Manager if it is appropriate to do so and they feel comfortable.

If a Employee feels it would be more appropriate, they should make a report to Human Resources (HR) in the first instance. In either case, the Line Manager or HR will make a report by submitting a case via email to [corporateCompliance@delamode-group.com](mailto:corporateCompliance@delamode-group.com) which is monitored by the Whistleblowing officer.

Where Employees do not feel it is appropriate to report a concern to either their Line Manager or HR, they can contact the Whistleblowing Officer directly using these contact details:

[corporateCompliance@delamode-group.com](mailto:corporateCompliance@delamode-group.com)

or at the following address:

PRIVATE & CONFIDENTIAL  
Delamode Group  
Attention: The Whistleblowing Officer  
700 Avenue West, Skyline 120 Braintree, Essex  
CM77 7AA

You may raise your concern by telephone, in person or in writing to the contacts noted above. The earlier you express your concern, the easier it is to act. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the Company and there are reasonable grounds for your concern.



All reports will be case managed, and an indication given of how the concern will be investigated and the timeline within 28 days. If it is not possible for initial enquiries to be completed within 28 days, the system will be updated to explain the reasons.

Whether the concern has been reported anonymously or not, the disclosing Employee may request at any time for an update on how the case is progressing.

The Whistleblowing Officer will oversee all reports to ensure they are addressed, investigated, and concluded appropriately.

### **Investigation**

Disclosures made by Employees will be taken seriously and dealt with confidentially and sensitively, through a prompt and detailed investigation.

All concerns that meet the Whistleblowing criteria will be investigated by the Whistleblowing Officer and/or the Delamode central finance team and Risk, or such other responsible person as they may identify.

The format of an investigation will depend on the subject matter but will usually involve interviews with relevant people and witnesses (including the disclosing Employee), as well as consideration of any documentary or other evidence (such as CCTV).

If the concern is covered by another Policy, and it is appropriate to do so, it will be referred for investigation to the appropriate Function to investigate.

Some concerns may be capable of resolution by agreed action without the need for more detailed investigation, or they may have already been investigated or dealt with under an alternative process or notification.

If the decision is taken to not investigate further, we will give an explanation to the disclosing Employee.

Investigations will usually be undertaken by a member of Senior Management in Delamode (duly appointed by the Whistleblowing Officer) who is independent of the Employee and of their business area, and who has no direct or indirect interest in the area of concern. Senior Managers or external advisers with specialist knowledge of the area of concern may be brought in, if appropriate.

If appropriate and the Employee is known, the independent appointed investigator will arrange a meeting with the Employee as soon as possible, to discuss the concern. Employees may bring a employee or union representative to any meetings under this Policy, but any companion must respect the confidentiality of the disclosure and any subsequent investigation.

In circumstances which may involve civil or criminal offences, the concern will be notified to the Police or appropriate Regulator and investigated with full cooperation from Delamode. The Whistleblowing Officer will be the Company representative and Delamode contact for the Police investigation or that carried out by the appropriate Regulator.



### How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within the Company to raise concerns. The Company hopes you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside the Company, the following are the Company's prescribed contacts:

- the External Auditor:
- the police
- other relevant bodies prescribed by legislation – the Company's Whistleblowing Officer will be able to advise you who you can contact

If you raise concerns **outside** the Company, you should ensure that it is to one of these prescribed contacts. A public disclosure to anyone else could take you outside the protection of the Public Interest Disclosure Act and of this Policy.

You should not disclose information that is confidential to the Company or to anyone else, such as a client or contractor of the Company, except to those included in the list of prescribed contacts.

This Policy **does not** prevent you from taking your own legal advice.

### Corporate Recording and Monitoring

The Delamode central finance team will maintain a register containing all concerns that are brought to their attention. All persons allocated to investigate a concern must ensure the Delamode central finance team is provided with sufficient details for the register.

The Delamode central finance team will review the register and produce an annual report for Delamode Group Board. The report will include a summary of the concerns raised, to which department they related, the post to which the concerns related (if not confidential) and any lessons learned. The report will not include any Employee names. The aim of this is to ensure that:

- the Company and/or the relevant department learns from mistakes and does not repeat them, and
- consistency of approach across the departments

The register together with the annual reports will be available for inspection by internal and external audit, after removing any confidential details.