

POLICY NAME	Whistleblowing Policy
PURPOSE	To provide clear rules and guidelines on raising concerns of wrong doing, and to offer protection to those employees who highlight wrong doing
APPLIES TO	All Staff
DATE IMPLEMENTED	January 2015

1 Introduction

- 1.1 Employees are often the first people who realise that there may be something seriously wrong within an organisation but may be reluctant to express their concerns. This could be for a number of reasons; because speaking up might be regarded as disloyal by employees, fear of victimisation, doubts about reporting what might only be a suspicion, or because it might seem easier to ignore it and not get involved.
- 1.2 Arctics Limited (trading as Igloo and referred to as the ‘Company’) is committed to high standards of fairness, honesty, openness and accountability. As part of that commitment, employees or others with serious concerns about wrongdoing are encouraged to do the right thing and come forward and express those concerns. In many cases, concerns or complaints can be dealt with informally. However, it is recognised that in some cases employees will need to come forward on a confidential basis.
- 1.3 The Company wishes to make it clear that employees can disclose such concerns without fear of reprisal or victimisation and that action will be taken where appropriate.
- 1.4 There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This Whistleblowing Policy is intended to cover concerns about wrongdoings that fall outside of that procedure and is not intended to replace it.

2 Aims

- 2.1 This policy aims to:
- Provide confidential avenues for you to raise concerns of wrongdoing and receive feedback on any action taken;
 - Allow you to take the matter further if you are dissatisfied with the initial response;
 - Reassure you that you will be protected from reprisals or victimisation for whistleblowing in good faith, provided that you have followed the recognised procedure;
 - Recognise that whilst such concerns will be voiced in good faith, the fundamental principle of natural justice will operate in response of any individual or collective group against whom a concern has been expressed. This will not, however, prevent the Company from suspending such individuals from their employment if it is considered appropriate to do so. In such circumstances suspension will not be regarded as a punitive measure.

3 Examples of wrongdoing

3.1 The activities that are covered by this policy are as follows:

- Criminal activity by an individual or a collective body;
- A breach of legal obligation, including negligence, breach of contract;
- Corrupt or fraudulent behaviour;
- A breach of agreed procedures; or
- Danger to health and safety or the environment.

4 Procedure

4.1 Any concerned employee should come forward at an early stage and before problems develop into something more serious. As a first step you should raise concerns with your Manager. Should you not be willing to do this for some reason you should contact another Manager or Director. If required, a confidential discussion can be requested with any Manager or Director and any such contact will be treated in strict confidence.

4.2 If preferred, you can chose to come forward with a co-worker, or another representative to report a concern. If you wish you may ask a representative of a professional organisation to raise the matter on your behalf.

4.3 You are welcome to raise your concern by telephone or through a direct meeting. If you wish to set out the background to your concern in writing and provide documents in support, this would be helpful. Alternatively you may choose to explain the reasons for your concern verbally. A note will be taken at the time when you express your concern and this note will be used as evidence.

4.4 Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the Manager concerned that there are sufficient grounds for your concern.

5 Company Action

5.1 Any action taken by the Company will depend on the nature and scale of the alleged wrongdoing and the evidence that is available. The Company is committed that any problem reported will be dealt with promptly and conscientiously. The Company will always pursue fraud and serious abuse as vigorously as possible or, if necessary, through the courts. Serious matters will be reported to the Police where appropriate.

5.2 Any Company investigation will be conducted impartially, objectively, in confidence and in a timely manner and the results acted upon appropriately. The Company has to be fair not only to the employee who makes the report but also to any others involved. If someone is being accused of misconduct, his or her side of the story will be investigated as well.

5.3 Some matters may be resolved without the need for an investigation or formal action.

6 Protecting our employees

- 6.1 The Company will do everything legally possible to respect the employee's confidentiality and protect his/her identity, if this has been requested. Concerned employees will be supported and protected from reprisals or victimisation as far as possible. If an employee comes forward with a concern, he/she can be confident that this will not affect their career prospects. This applies equally if an employee comes forward in good faith with a concern that turns out later not to be justified.
- 6.2 Employees within the UK are also protected under the Public Disclosure Act 1998, which came into force in January 1999. This Act provides legal protection to those who speak up and who honestly and reasonably believes at the information they disclose or the allegations they make are substantially true. The Company extends the protection provided in this Act to employees at any Company location.
- 6.3 Any attempt to discourage anyone from coming forward to express a genuine concern will be treated as a disciplinary offence. In the same way, anyone who criticises or victimises the employee after a concern has been expressed may be subject to disciplinary action.
- 6.4 Employee contracts require that confidential, false or misleading information should not be disclosed. Should you be considering taking a concern outside of the Company, you should be aware of your duty of confidentiality and ensure that any matter being disclosed is in accordance with relevant local legislation. In the UK, this means a "qualifying disclosure" as set out in the Public Disclosure Act.

7 Monitoring the Process and Code

- 7.1 Confidential records will be kept of all matters raised through this policy.