

2San Global Limited  
Unit 11 Oakwood Way, Carnforth Business Park, Carnforth, LA5 9FD, UK



Policy Name	WHISTLEBLOWING POLICY	Policy Version	1.1
Effective Date	20.08.2021	Date of Last Revision	23.08.2021
Admin Responsible	SIMON WHILEY, GLOBAL MANAGING DIRECTOR		

VERSION HISTORY				
Version	Approved by	Revision Date	Description of Change	Author
1.0	SIMON WHILEY	20.08.2021	FIRST ISSUE	CORNELIA PANAYIOTOU
1.1	NEIL ASHWORTH	23.08.2021	FINAL VERSION	CORNELIA PANAYIOTOU

## RELATED DOCUMENTS

Below provides a list of all supporting documents that are linked to the WHISTLEBLOWING POLICY.

Document Reference	Document Name

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## INTRODUCTION

### POLICY STATEMENT

The Board of 2San Global Limited recognises the significance of WHISTLEBLOWING POLICY and maintaining the highest standards of customer care and partnership that are fundamental to its brand promise of “Better Care, Better Life”.

### ABOUT THIS POLICY

#### OVERVIEW

- 13.1 This policy outlines what you should do if you suspect something happening at work is putting you or others in danger or is illegal or unethical.
- 13.2 It applies to all employees, contractors, consultants, officers, interns, casual and agency workers. It does not form part of your contract of employment and can be amended at any time.

#### WHAT IS WHISTLEBLOWING?

- 13.3 Our aim is to maintain the highest standards of integrity in everything we do, but all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have such concerns, we encourage you to report them immediately – this is called ‘whistleblowing’. You can be assured that we will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.
- 13.4 The types of concerns you may want to raise with us by whistleblowing include:
  - 13.4.1 Any activity you suspect is criminal.
  - 13.4.2 Any activity you suspect puts health and safety at risk.
  - 13.4.3 Any activity you suspect may damage the environment.
  - 13.4.4 Any activity you suspect is a miscarriage of justice.
  - 13.4.5 Any activity you suspect breaches our policy on bribery and corruption.
  - 13.4.6 Any failure to comply with legal or regulatory obligations.
  - 13.4.7 Any failure to meet professional requirements.
  - 13.4.8 Any attempt to conceal one or more of these activities.
- 13.5 Speak to your manager if you are not sure whether something you have become aware of is covered by this policy. Note that this policy does not cover anything to do with you personally – how other people are treating you, for example. For this, please refer to our policies on bullying and harassment and then to our grievance procedure for guidance on how to proceed.

#### HOW TO RAISE A WHISTLEBLOWING CONCERN

- 13.6 In most cases, you should start by raising your concerns with your manager, either face-to-face or in writing.

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- 13.7 If you would prefer not to go to your manager, or your manager fails to address all your concerns, you should write to one of our directors or HR Manager. You should also do this if your concerns are of a very serious nature.
- 13.8 Your letter should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.
- 13.9 You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, you must both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.
- 13.10 After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.
- 13.11 You will be kept informed about how our investigations are progressing and how long they are likely to take. Sometimes, however, we may be unable to give you details about the investigation (or any action it leads to) as we need to protect confidentiality. We understand this may be frustrating and give you concerns about whether we have actually done anything, and if this happens we will do our best to sit down with you and explain why we are acting in the way we are.
- 13.12 Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of our directors or HR Manager for further consideration.
- 13.13 Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our disciplinary policy and may be dismissed for misconduct, or even gross misconduct.

### **CONFIDENTIALITY AND ANONYMITY**

- 13.14 There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.
- 13.15 You are always encouraged to raise concerns openly, and if you prefer to do so in confidence we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation but will always discuss this with you first.
- 13.16 You are protected from reprisals under this policy (see paragraph 13.18 and 13.19), but if you are still worried we encourage you to discuss this with us and we will explore how far we can go in keeping your concerns confidential.
- 13.17 Concerns raised anonymously are very difficult – and sometime impossible – to investigate. We can't properly establish whether your allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

### **HOW WE PROTECT WHISTLEBLOWERS**

- 13.18 If you raise a concern in good faith under this policy, we will support you fully even if we find throughout investigations that you made a mistake. However, if you feel you have been treated detrimentally as a result of raising a concern, you must tell us at once. First inform your manager and, if the matter remains unresolved, you must follow the formal process in grievance procedure.

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- 13.19 All whistle-blowers are afforded the same protection, so you must not threaten others who have raised concerns. You may face disciplinary action if we find that you have acted in this way.

### **TAKING YOUR CONCERNS OUTSIDE OUR BUSINESS**

- 13.20 This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside our business to become involved when a whistleblowing allegation is made.
- 13.21 In some exceptional circumstances, you may need to go to an external body – an industry regulator, for example – and the independent charity Protect can direct you towards the appropriate regulator for the type of issue you want to raise.
- 13.22 This policy covers the actions of third parties such as suppliers, service providers, and customers, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your manager will be able to explain how you should proceed.
- 13.23 Alerting the media to a concern – particularly before or during an internal investigation – is almost never justified or appropriate in any situation. We strongly discourage you from doing so and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Protect before being justified in approaching the press.

### **POLICY SCOPE & COMPLIANCE**

This policy applies to all 2San Global Limited locations and staff and to all information and information systems, on which 2San Global Limited depends. All staff are responsible for complying with this policy.

### **POLICY GOVERNANCE**

The following table identifies who within 2San Global Limited is Accountable, Responsible, Informed or Consulted with regard to this policy.

- **RESPONSIBLE:** Neil Ashworth – Non Executive Board Director
- **ACCOUNTABLE:** Simon Whiley – Global Managing Director
- **CONSULTED:** Board of 2San Global Limited, Departmental specialists and teams
- **INFORMED** All employees, all contractors, all other 3rd party organisations with any form of access to 2San Global Limited's information and information systems.

This policy will be reviewed as it is deemed appropriate, but no less frequently than annually.

Policy review will be undertaken by the Board of 2San Global Limited, Departmental specialists and external sources where appropriate.

### **ROLES & RESPONSIBILITIES**

WHISTLEBLOWING POLICY is a responsibility of all staff. The ultimate responsibility for information security lies with SIMON WHILEY, GLOBAL MANAGING DIRECTOR but this responsibility is discharged through the designated roles of Departmental Director / Heads of / Specialists etc.

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### **AWARENESS, TRAINING & QUERIES**

The WHISTLEBLOWING POLICY is readily accessible internally via the company intranet, and can be provided upon request to external parties.

WHISTLEBLOWING POLICY awareness is incorporated in the induction process and delivered on an on-going basis through a number of communication methods, including:

- Mandatory annual compliance training
- Intranet awareness page
- Team Briefings, Meetings and Conferences
- Emails To discuss any matter relating to the WHISTLEBLOWING POLICY, contact your Head/Director of Department in the first instance.

### **POLICY REVIEW DETAILS**

Date of publication	20.08.2021
Frequency of review	2 years
Due date of next review	20.08.2023
Due date of next review	Simon Whiley, Global Managing Director