
Whistleblowing Policy

1. Introduction

Whistleblowing occurs when a worker raises a concern or discloses information which relates to wrongdoing, dangers, illegal practices or unethical conduct which has come to their attention through work.

GRAHAM is committed to ensuring the proper conduct of its business and to effective governance, the highest possible standards of openness, honesty and accountability.

This policy supports that commitment by encouraging employees and others who may have concerns about possible wrongdoing by GRAHAM's to be able to raise those concerns in good faith, in confidence and without fear of recrimination.

GRAHAM is committed to dealing responsibly and professionally with all genuine concerns raised under this policy and acknowledges the legal protection, under the Protected Disclosures Amendment Act 2014 provided for workers who make disclosures about improper practice.

This policy is non-contractual, and we may amend it at any time.

2. Aim Of This Policy

The aim of this policy is to encourage workers to feel confident and safe to come forward with any concerns they have about wrongdoing in the workplace.

This policy provides an avenue within this workplace to deal with concerns or disclosures in regard to wrongdoing. We are confident that issues can be dealt with "in house" and we strongly encourage workers to report such concerns internally.

In this policy we:

- Explain what Whistleblowing is;
- Encourage the reporting of suspected wrongdoing as soon as possible;
- Explain the process for raising concerns to GRAHAM;
- Reassure workers that they can raise genuine concerns without fear of penalisation or threat of less favourable treatment, discrimination or disadvantage, even if they turn out to be mistaken.

This policy does not replace the Company's grievance procedure, and depending on the particular concern a worker has, they may be referred to the Grievance Procedure or the Dignity at Work procedure where applicable.

3. Who Is Covered by This Policy?

This policy covers disclosures made by both workers and Third Parties. Workers include employees at all levels, agency workers, trainees, apprentices, interns etc. Third Parties are defined as individuals who are not employed by GRAHAM e.g. visitors or sub-contractors.

4. What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. It can be about something that is happening now, has taken place in the past, or is something this is about to happen. It can include:

- Criminal/illegal activity
- Actions that are fraudulent, and/or corrupt, including the making and/or accepting of bribes
- Actions that jeopardise the integrity of the Company
- Failure to comply with legal or professional obligations
- Failure to comply with regulatory requirements
- Actions that compromise health and safety at work
- Damage to the environment
- Financial fraud or mismanagement, including misuse of public funds
- The concealment of any of the above wrongdoing, including destroying any information about it
- Similar behaviour not otherwise described.

A **whistle-blower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it as soon as possible under this policy.

5. Safeguards

5.1. Protection from penalisation

GRAHAM recognises that whistle-blowers are sometimes worried about possible repercussions.

However anyone who raises a concern in good faith under this policy will not be penalised by this organisation as a result of raising a concern. If you believe you have suffered any such treatment, you should inform Group Governance Risk and Assurance Manager immediately.

Workers must not penalise, threaten or retaliate against a whistle-blower in any way. Anyone involved in such conduct may be subject to disciplinary action up to and including dismissal.

5.2. Confidentiality

GRAHAM's is committed to protecting the identity of the worker raising a concern and ensures that relevant disclosures are treated in confidence. The focus will be on the wrongdoing rather than the person raising the concern.

However there are circumstances, as outlined in the Act, where confidentiality cannot be maintained particularly in a situation where the worker is participating in an investigation into the concern that has been raised. Should such a situation arise, we will make every effort to inform the worker that their identity may be disclosed.

5.3. Raising a Concern Anonymously

A concern may be raised anonymously. However on a practical level it may be difficult to investigate such a concern. We would encourage workers to put their names to allegations, with our assurance of confidentiality where possible, in order to facilitate appropriate follow-up. This will make it easier for us to assess the disclosure and take appropriate action including an investigation if necessary.

5.4. False Allegations

Workers must have a reasonable belief that there are grounds for their concern. Anyone who makes a false or malicious allegation may be subject to disciplinary action up to and including dismissal.

6. Whistleblowing Complaint Procedure

6.1. How To Report Any Concerns

If you have information that leads you to reasonably believe there has been wrongdoing of the type covered by this policy, you should raise the matter with either:

- the Group Governance Risk and Assurance Manager Helen Patton
- the Group Chief Financial Director – Courtney McCormick

Contact details can be found at section 7 below.

Where possible your concerns should be raised in writing setting out the background and history of the matter, giving names, dates and places where possible, and the reason why the situation has raised particular concern. You should also, where possible, set out the sequence of events and description of the circumstances.

If you feel unable to put a concern in writing, you can telephone or meet the appropriate manager. We will make a written record of any concern raised verbally and will provide you with a copy after our meeting,

6.2. How We Will Deal With The Disclosure:

GRAHAM takes reports of wrongdoing seriously and we will carry out an investigation into the matters that have been raised.

Having raised your concern with us, we will arrange a meeting to discuss the matter with you on a strictly confidential basis. We will need to clarify at this point if the concern is appropriate to this procedure or is a matter more appropriate to our other procedures, for example our Grievance or Dignity at Work procedures. You can choose whether or not you want to be accompanied by a colleague or a trade union representative.

The HR Director will log all reports and will carry out a preliminary review to determine the most appropriate course of action based on the nature of the concern raised. The actions will also be logged. Any matters which fall within the scope of other existing procedures will be dealt with under those procedures.

Depending on the nature of the concern raised, actions may involve simply clarifying certain matters, clearing up misunderstandings or resolving the matter by agreed action without the need for an investigation.

If, on foot of the initial assessment, we conclude that there are grounds for concern that cannot be dealt with at this point, we will conduct an investigation which will be carried out fairly and objectively. The form and scope of the investigation will depend on the subject matter of the disclosure.

Disclosures may, in the light of the seriousness of the matters raised, be referred immediately to the appropriate authorities. Likewise if urgent action is required (for example to remove a health and safety hazard), this action will be taken.

It is important to us that you feel assured that concerns raised by you under this policy are taken seriously and that you are kept informed of steps being taken by us in response your disclosure. In this regard we undertake to communicate with you as follows:

- We will acknowledge receipt of your disclosure and arrange to meet with you as outlined above;
- We will inform you of how we propose to investigate the matter and keep you informed of actions, where possible, in that regard including the outcome of any investigation, and, should it be the case, why no further investigation will take place. However it is important to note that sometimes the need for confidentiality and legal considerations may prevent us from giving you specific details of an investigation.
- We will inform you of the likely time scales in regard to each of the steps being taken.

It is possible that in the course of an investigation you may be asked to clarify certain matters. To maximise confidentiality such a meeting can take place off site and you can choose whether or not to be accompanied by a colleague or trade union representative.

If you raise a matter and then later decide to withdraw your concern, GRAHAM will respect your wishes wherever possible. However, if the matter is assessed as serious, then GRAHAM will, where it is deemed appropriate, continue to investigate which may result in further evidence being required from you.

7. Contact Details

If an employee wishes to raise a concern they can contact either:

If an employee wishes to raise a concern they can contact either: - Group Governance Risk and Assurance Manager– **Helen Patton** Telephone: 028 9268 1963 Helen.Patton@Graham.co.uk Group Chief Financial Officer – **Courtney McCormick** Telephone: 028 9268 1923 Courtney.Mccormick@graham.co.uk

8. How the matter can be taken further

We acknowledge that there may be circumstances where an employee wants to make a disclosure externally, and the Protected Disclosures Act 2014 provides for a number of avenues in this regard.

It is important to note however that while you need only have a reasonable belief as to wrong doing to make a disclosure internally, if you are considering an external disclosure, different and potentially more onerous obligations apply depending on to whom the disclosure is made.

If you do not wish to go through our internal reporting mechanism, or you are unhappy with the outcome of any investigation undertaken, please feel free to contact any of the other external organisations listed below:

8.1. Other contacts include (by way of example)

- Garda
- Citizen's Information
- Revenue
- Environmental Protection Agency
- Health and Safety Authority
- Information Commissioner
- Health Assured 01886 0324