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NWF GROUP WHISTLEBLOWING POLICY

- 1.1. The Company is committed to conducting its business with honesty and integrity, and it expects all employees to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.
- 1.2. The aims of this policy are:
 - 1.2.1. To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - 1.2.2. To provide employees with guidance as to how to raise those concerns; and
 - 1.2.3. To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3. This policy covers all employees.
- 1.4. This policy does not form part of any employee's Contract of Employment and the Company may amend it at any time.

What is Whistleblowing

- 1.5. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - 1.5.1. Criminal activity;
 - 1.5.2. Failure to comply with any legal or professional obligation or regulatory requirement;
 - 1.5.3. Miscarriages of justice;
 - 1.5.4. Danger to health and safety;
 - 1.5.5. Damage to the environment;
 - 1.5.6. Bribery under the Anti-Bribery and Corruption Policy;
 - 1.5.7. Financial fraud or mismanagement;
 - 1.5.8. Negligence;
 - 1.5.9. Breach of the Company's internal policies and procedures;



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- 1.5.10. Conduct likely to damage the Company's reputation;
- 1.5.11. Unauthorised disclosure of confidential information;
- 1.5.12. The deliberate concealment of any of the above matters.
- 1.6. 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 the Company's activities (a "whistleblowing concern") you should report it under this policy.
- 1.7. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Policy or Anti-Harassment and Bullying Policy as appropriate.
- 1.8. If you are uncertain whether something is within the scope of this policy you should seek advice from your HR Business Partner, or alternatively the Group Company Secretary, Rob Andrew .

Raising a Whistleblowing Concern

- 1.9. The Company hopes that in many cases you will be able to raise any concerns with your Manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.
- 1.10. However, where the matter is more serious, or you feel that your Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the followings:
 - 1.10.1. The HR Business Partner in your division or the Group Company Secretary
 - 1.10.2. The external confidential whistleblowing service. Contact details are set out at the end of this Policy.
- 1.11. The Company will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 1.12. The Company will record a written summary of your concern and provide you with a copy after the meeting. The Company will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

- 1.13. The Company hopes that employee will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, the Company will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, the Company will discuss this with you.
- 1.14. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Company Secretary or one of the other contact points listed above and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you



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can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline.

Investigation and Outcome

- 1.15. Once you have raised a concern, the Company will carry out an initial assessment to determine the scope of any investigation. The Company will inform you of the outcome of our assessment. You may be required to provide further information.
- 1.16. In some cases, the Company may appoint an investigator or team of investigators including employee 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.
- 1.17. The Company will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Company giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 1.18. If the Company concludes that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

If You Are Not Satisfied

- 1.19. While the Company cannot always guarantee the outcome you are seeking, the Company will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help the Company to achieve this.
- 1.20. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts above. Alternatively, you may contact the chairman of the Group or the Company's external auditors.

External Disclosures

- 1.21. The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 1.22. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. The Company strongly encourages you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.
- 1.23. Whistleblowing concerns usually relate to the conduct of the Company's employee, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, the Company encourages you to report such concerns internally first. You should contact your Manager or one of the other individuals set out above for guidance.



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Protection and Support for Whistle-blowers

- 1.24. It is understandable that whistle-blowers are sometimes worried about possible repercussions. The Company aims to encourage openness and will support an employee who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 1.25. Whistle-blowers must not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group Company Secretary or Group Head of HR immediately. If the matter is not remedied, you should raise it formally using the Grievance Policy.

If you have any concern over wrongdoing at work

- Report it to your line manager, or
- Speak to a senior manager, or
- Call Safecall

0800 915 1571

Report online at: www.safecall.co.uk/report

All calls are treated confidentially by Safecall and you may remain anonymous if you wish.