



Morson Group

Whistleblowing Policy

MG | HR | POL | 008


Issue 10 – August 2023

Contents

1. Document Control	3
2. Introduction.....	4
3. Scope.....	4
4. Definitions	4
5. Principles	4
6. Procedure	5
7. Responsibilities	6
8. Amendments.....	7

1. Document Control

Morson Reference:	MG/HR/POL/008
Title:	Whistleblowing Policy
Version:	10
Date:	August 2023
Prepared For:	HR
Classification:	INTERNAL

	Name	Signature	Date
Created By:	Emma Lowrey		07/08/2023
Checked By:	Katie Winstanley		07/08/2023
QA Approval:	Gareth Morris		07/08/2023
MG Approval:	Ged Mason		07/08/2023

2. Introduction

The Group aspires to the highest possible standards of service and behaviours. However, it is recognised that there is always a risk of things going wrong. A culture of openness is encouraged to resolve issues and it is the obligation of every colleague to bring malpractice or problems to the company's attention.

3. Scope

The policy covers all individuals employed by Morson Group as well as those engaged with the Group in the capacity of consultants, contractors, casual and agency staff (hereafter referred to as "colleagues").

This policy does not form part of your Contract of Employment. We may vary this policy at any time.

4. Definitions

The following are examples of issues which may fall within this policy:

- A risk to health and safety of colleagues
- Activities or practices that cause harm or pose significant risks to the environment.
- Criminal activities
- Financial fraud or mismanagement
- The receiving or giving of bribes as defined in the Anti-bribery and corruption policy
- Failure to comply with a legal obligation (under any statute, regulation, contract or at common law)
- Interference with proper judicial process (such as, for example, destruction of evidence in any proceedings involving the company)
- Instances of misuse or misappropriation of company assets, including theft, unauthorised use of intellectual property
- A deliberate cover-up of any of the above

This policy is not applicable to employment-related issues with, or grievances against, colleagues or managers where the standard grievance procedure will then apply.

5. Principles

5.1.

The Group will take prompt steps to investigate and remedy any deficiencies brought to its attention in accordance with this statement.

5.2.

Any colleague who makes a good faith disclosure under this policy is performing a valuable service to the company and will be protected from any detrimental actions for having done so.

5.3.

The taking of any detrimental action against any colleague, who has made a good faith disclosure under this policy because of that disclosure, will be a disciplinary offence.

6. Procedure

6.1.

We hope in many cases you will be able to raise any concerns with your line 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. In some cases, they may refer the matter to the Group HR Director or Group Compliance and Assurance Director.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the HR department.

6.2.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meeting under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

6.3.

A written summary of your concern will be taken down and a copy provided to you after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

6.4.

We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact

points listed in paragraph 6.1 and appropriate measures can then be taken to preserve confidentiality.

6.5.

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of any assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

6.6.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of any investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

6.7.

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

6.8.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

7. Responsibilities

7.1. Board of Directors

The Board of Directors are responsible for:

- Overall responsibility for this policy and reviewing the effectiveness of actions taken in response to concerns raised under this policy.

7.2. HR department

The HR department are responsible for:

- Day-to-day operational responsibility for this policy.
- Ensuring that all colleagues who may deal with concerns or investigations under this policy receive appropriate training.

8. Amendments

Issue	Date	Description
1	December 2007	Draft for review
2	July 2012	Format amendments
3	October 2013	Re-branding
4	August 2015	Re-branding
5	July 2016	Reviewed
		Reviewed on 01/06/2017 – NO CHANGES
		Reviewed on 21/06/2018 – NO CHANGES
		Reviewed on 12/08/2019 – NO CHANGES
6	August 2020	Section 3.3 – included the risk to employees Health Rebrand – JM
7	January 2021	Clarification of reporting procedure, formatting edit
8	June 2021	Rebrand Review
9	June 2022	Amendment – Group HR Director
10	June 2023	Amendment- Misappropriation of company assets added under issues the policy covers