

# **HARDIDE PLC & SUBSIDIARIES**

(‘Hardide’ or the ‘Company’)

## **WHISTLEBLOWING POLICY & PROCEDURES**

**As Reviewed and Confirmed on 17<sup>th</sup> August 2018,  
by the Board of the Company  
(the ‘Board’)**

### **What Is Whistleblowing?**

A “whistleblower” is someone who discovers something that is wrong and alerts their employer or the relevant authorities to what is going on. The law protects whistleblowers from their employer subjecting them to detriment or dismissal by reason of their having “blown the whistle” and from detrimental treatment by their colleagues. To be protected by the law, the act of whistleblowing must fall within the legal rules and the whistleblower must reasonably believe that their disclosure of wrongdoing is made in the public interest.

### **Our Policy**

Our business is run in accordance with the law. No employee will suffer a detriment for speaking up if they believe that something is wrong.

If you have information you believe indicates any of the following:

- a criminal offence was committed or is being or is likely to be committed
- a person has or is or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred or is or is likely to occur;
- the health and safety of any individual has been or is being or is likely to be endangered;
- behaviour that you believe is unethical or immoral;
- the environment has been, is being or is likely to be damaged; or
- that information tending to show any matter falling within any one of the above categories has been, is being, or is likely to be deliberately concealed;

you are encouraged to raise your concerns immediately with a director. If the matter that you are concerned about and report turns out to be of no concern you will not be prejudiced and the Company will aim to keep your identity confidential.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

However, you will still be protected in law if you disclose the information to the following:

- i. a legal adviser in the course of getting legal advice;
- ii. a Minister of the Crown; or
- iii. one of the prescribed persons set out in the Public Interest Disclosure (Prescribed Persons) Order 1999 (e.g. disclosure of a danger to health and safety to the Health and Safety

Executive or OSHA in the USA; disclosure of fraud to the Secretary of State for Trade and Industry; disclosure of breach of tax rules to HM Revenue & Customs); or

iv. the equivalent individual or body set out in i. to iii. above in the country in which you are employed or visit on behalf of the Company.

Generally, disclosure to any other person is not protected, except in very limited circumstances.

After you have raised a concern, we will decide how to respond in a responsible and appropriate manner. This will usually involve making internal enquiries but it may become necessary to carry out a full investigation which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

We will keep you informed of progress and let you know when the investigation is completed. We will not be able to inform you of any matters that would infringe any duty of confidentiality owed to others.

If you use this policy to raise a concern which you reasonably believe to be in the public interest or the interest of the Company, we assure you that you will not suffer any form of retribution or detrimental treatment.

Any employee who criticises, bullies or victimises a fellow employee because of their whistleblowing will be liable to disciplinary action up to and including dismissal, depending on the seriousness of the conduct.

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