

WHISTLEBLOWING POLICY

Purpose and scope

We are committed to conducting business with honesty and integrity and we expect our team to maintain high standards too. We encourage open communication from all those who work for us, and we want everyone to feel secure about raising concerns. This policy applies to employees, officers, consultants, freelancers, contractors, and other workers. It does not form part of any contract of employment and may be amended at any time.

Individuals have protection under whistleblowing laws if they raise concerns in the correct way. It does not matter if an individual who raises a concern is mistaken about it. Individuals do not have to prove anything about the allegation they are making but must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

We are committed to the principles set out in this policy. If you use this policy to raise a concern, you will not suffer any form of retribution or detrimental treatment. We will treat your concern seriously.

Definition of whistleblowing

There is a difference between whistleblowing and raising a grievance:

- **Whistleblowing:** where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens clients, third parties, or the public generally.
- **A grievance:** a complaint that generally relates to an individual's own employment position or personal circumstances at work. The process for raising grievances is set out in our Grievance Procedure which can be found on breatheHR.

Whistleblowing is the reporting of suspected malpractice, wrongdoing, or dangers in relation to the activities the Company undertakes. The kinds of malpractice covered by this policy include:

- criminal offences, including those in relation to bribery and corruption and tax evasion facilitation;
- miscarriages of justice;
- danger to the health and safety of any individual;
- damage to the environment;

- breach of any legal obligation, including those in relation to bribery and corruption and tax evasion facilitation;
- deliberately concealing any of the above.

Procedure for raising a concern

If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with your line manager. If you feel you cannot tell your line manager, you should raise the issue with a director, or with the HR & Operations Manager.

A concern can be raised by telephone, in person or in writing, although a written statement is preferable. Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, you will generally need to provide details of the nature of the concern and why you believe it to be true, and the background and history of the concern (giving relevant dates where possible). In addition, if you have any evidence you can provide to us, this would be helpful.

It is likely that we will arrange a meeting with you and then carry out internal enquiries in order to investigate the concerns raised.

Protection and support for those raising concerns

The Company will do as much as is reasonably possible to preserve the anonymity of anyone reporting their suspicions, although no system is fool proof and there may be times where your identity is self-evident. There may also be occasions when anonymity must be waived because of the nature of an allegation.

We are committed to being supportive to employees who raise genuine concerns under this policy, even if they turn out to be mistaken. Any individual raising a genuine concern must not suffer any detriment as a result of doing so. No employee must threaten or retaliate against an individual who has raised a concern and we will not tolerate harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action. If you believe you have suffered a detriment as a result of a disclosure, you should follow our Grievance Procedure.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest may also be liable to disciplinary action.

Raising your concern externally

We would expect that in most cases, raising concerns internally would be the most appropriate course of action. If you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for you to raise the matter with another prescribed person, such as a regulator or professional body,



or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available on the GOV.UK website - [Whistleblowing: list of prescribed people and bodies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-list-of-prescribed-people-and-bodies)

Aspire Scientific HR

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