

# WHISTLEBLOWING POLICY

## Introduction

Impellam Group plc (the "Company") seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organisation, we believe that we can help prevent such situations occurring. We expect all employees to maintain high standards and to report any wrongdoing that falls short of these fundamental principles. The aim of this policy is to ensure that our employees are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

## Scope

The policy covers all employees who are working under a contract of service with the Company or agents / contractors working on behalf of the Company referred to as "employees". It applies when an employee has grounds to believe that malpractice has occurred, is occurring or is likely to occur in connection with the Company.

## Purpose

The purpose of this policy is to provide a rapid mechanism under which genuine concerns can be raised without fear of adverse consequences for the employee.

For the purpose of this policy, the employee making a disclosure will be referred to as the 'Discloser'.

## Key Principles

- The Company is committed to the highest standards of openness, probity and accountability.
- The Company will fully observe the provisions of the Public Interest Disclosure Act 1998.
- Any disclosure about suspected malpractice may be made, initially, to a member of the Standards Committee or the nominated service provider as set out below.
- Any disclosure to a member of the Standards Committee under this procedure should, as far as is practicable, be in writing.
- The 'Discloser' should provide as much supporting written or other evidence as possible about the disclosure and the grounds for the belief of malpractice.
- The Company will treat all disclosures under this Policy in a sensitive and, as far as possible under this Policy, confidential manner.
- The 'Discloser' may at any time disclose the matter on a confidential basis to a professionally qualified lawyer for the purpose of taking legal advice.
- If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatiously, in bad faith or with a view to personal gain, the Discloser will be subject to disciplinary action.
- This Policy is distinct from any of the Company's Grievance procedures. If an employee has a complaint relating to their personal circumstances in the workplace, the appropriate Grievance procedure should be used. Additionally, this Policy may not be used to obtain a rehearing of matters that have already been addressed under other Company procedures, such as Grievance or Disciplinary procedures
- An employee is protected in law against being dismissed or penalised by their employer if he

or she publicly discloses information that falls into one of the categories known as "qualifying disclosures" and that information is disclosed in a manner that is permitted in the Act.

## A Qualifying Disclosure

Qualifying disclosures are when the 'Discloser' reasonably believes:

- that a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health or safety of any individual has been, is being or is likely to be endangered;
- that 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 preceding paragraphs has been, is being or is likely to be deliberately concealed.

The belief need not be correct - it might be discovered subsequently that the 'Discloser' was in fact wrong - but the 'Discloser' must show that they held the belief, that it was a reasonable belief in the circumstances at the time of disclosure and that the qualifying disclosure was made in the public interest and in good faith.

## Procedure

### Reporting

Disclosures can be made by phone to the Impellam Group Confidential Disclosure facility provided by an external, independent specialist, SafeCall, on:



Country	Telephone Number	Country	Telephone number
Australia	0011 800 7233 2255	Poland	00 800 7233 2255
Belgium	00 800 7233 2255	Singapore (SingTel)	001 800 7233 2255
Canada	1877 599 8073	Singapore (M1)	002 800 7233 2255
France	00 800 7233 2255	Singapore (Star Hub)	008 800 7233 2255
Germany	00 800 7233 2255	South Africa	00800 7233 2255
Ireland	1800 812740	Switzerland	00800 7233 2255
Mexico	01800 123 1758	UK	0800 915 1571
New Zealand	00800 7233 2255	USA	1 866 901 3295

at any time, 24 hours a day, 7 days a week

or by e-mail to [Impellam@safecall.co.uk](mailto:Impellam@safecall.co.uk) or via the web at [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

When contacting SafeCall, you will be put in touch with someone who is trained to receive disclosures about concerns in the workplace. We assure you, that calls received by SafeCall will be treated confidentially and will not be tape recorded. Should you wish, SafeCall will maintain your anonymity.

It is preferable for whistleblowers to reveal their identity to SafeCall, who will only pass it on to the Standards Committee should you give their permission for your identity to be disclosed. They will collect all the information you wish to disclose and make the disclosure on your behalf, taking measures to preserve confidentiality if necessary. If appropriate, SafeCall will continue to liaise with you and feedback any resolution.

If you do not want to contact Safecall you can report your concern directly to a member of the

Standards Committee, who will require similar information to Safecall in order to progress.

### Investigation

We regret that we cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback, or ascertain whether your disclosure was made in good faith. After receiving the initial 'disclosure', the member of the Standards Committee will hold a confidential interview with the 'Discloser'. The purpose of this interview is to obtain as much information as possible about the grounds that support the believed malpractice and to consult with the 'Discloser' about further steps which could be taken.

The 'Discloser' will have the right to be accompanied by a work colleague at the interview. The companion of the 'Discloser' will be asked to respect the confidentiality of the qualifying disclosure and any subsequent investigation. In addition a note taker may accompany the member of the Standards Committee.

### Recommendations

After considering the information provided, the member of the Standards Committee will recommend what further steps should be taken. The following list is not exhaustive, but these may include one or more of the following:

- that the matter should be reported to the police or other appropriate public authority;
- that the matter should be investigated, either internally by the Company or by some other external investigators appointed by the Company;
- that an employee should be given the opportunity to seek redress in connection with the disclosure through the Company's Grievance procedures.

The grounds on which the member of the Standards Committee may recommend that no further action by the Company should be taken are as follows:

- that the 'Discloser' has not demonstrated a reasonable basis for alleging that malpractice within the meaning of this procedure has occurred, is occurring or is likely to occur;
- that the member of the Standards Committee is satisfied that the 'Discloser' is not acting in good faith;
- that the matter concerned is already the subject of legal proceedings, or has already been referred to the police or other public authority;
- that the matter is already (or has already been) the subject of proceedings under one of the Company's other procedures relating to staff.

The recommendations will be made, without revealing the identity of the 'Discloser' (except as outlined in the Confidentiality section) to a senior Company representative who is considered to be suitable by the Standards Committee.

The recipient will take all steps necessary to ensure that the recommendations are implemented, except in instances when in their opinion there are good reasons for not doing so. In such circumstances that decision, together with the reasons to support it, will be notified in writing to the Company Chairman as soon as practicable.

### Conclusion

Once the recipient has decided what further steps (if any) should be taken, the member of the Standards Committee will be advised of the decision and will inform the 'Discloser' of the decision and the reasons behind it.

If, having followed the above procedure, the 'Discloser' is not satisfied with either the decision reached or the associated outcome, they may raise the matter concerned on a confidential basis directly with the Company Chairman.

The 'Discloser' may also raise the matter with the Chair of the Audit Committee, if they have reasonable grounds for believing that all of the available members of the Standards Committee are

or were involved in the alleged malpractice, or that the 'Discloser' will be subjected to a detriment as a result of making the disclosure.

## The 'Discloser'

The Company will treat all disclosures under this Policy in a confidential and sensitive manner. Any report or recommendations will not identify the 'Discloser' unless written consent is given or unless there are grounds to believe that the 'Discloser' has acted maliciously.

In the absence of such consent or grounds, the member of the Standards Committee will not reveal the identity of the 'Discloser' under this procedure unless:

- where the member of the Standards Committee is under a legal obligation to do so; or
- where the information is already in the public domain; or
- on a strictly confidential basis to the member of the Standards Committee's secretary; or
- on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

## Named Individual

Whenever an allegation is made as part of this procedure against a named individual, that person will be told of the allegation and of the evidence supporting it, and will be allowed to respond before any investigation, or further action, is concluded. The point at which the individual is informed will depend on the nature of the case.

## Safeguards

Any documentation (including computer files and discs) kept by the member of the Standards Committee relating to the matter will be kept secure. As far as practicable, only the members of the Standards Committee and their administrative assistant and any legal adviser shall have access to it.

The 'Discloser' will not be required by the Company, without his or her consent, to participate in any further enquiry or investigation into the related matter. Participation at this later stage will usually be required to be on an open rather than a confidential basis, although the obligations under this procedure will remain in relation to the identity of the original discloser of information. This principle does not apply if there are grounds to believe that the 'Discloser' may have been involved in misconduct or malpractice.

The Company will not (and it will use all reasonable endeavours to ensure that its employees do not) subject the 'Discloser' to any detriment, on the grounds of the disclosure of information under this procedure. The individual should report any complaints of such treatment to a member of the Standards Committee. If they request the member of the Standards Committee to take action in relation to such complaints, the 'Discloser' may be asked for written consent to reveal their identity for the purposes of any such action.

## Questions?

If you have any concern regarding this document contact your local Legal team or [legal@impellam.com](mailto:legal@impellam.com)

### Standards Committee Members

Group CEO – Chair

Group General Counsel

Group Marketing and Services Transformation Director

Head of Group Audit & Risk