

WDS-QMP-111	Whistleblowing Policy			Rev 1	Pg 1 of 2
Issued by:	JAD	Date:	01/Oct/2021	Approved:	JAD

Whistleblowing Policy

1. Summary

This policy details the mechanism to speak up and raise concerns or suspicions of malpractice, impropriety or wrongdoing within WDS. This includes incidents which may adversely affect the business, customers, clients, third parties, suppliers, other employees, or matters that are in the public interest.

WDS takes *whistleblowing* very seriously and employees must be able to raise concerns where they genuinely believe that wrongdoing has occurred and the established day to day escalation and reporting procedures are exhausted, unavailable or not appropriate.

Employees shall have the levels of protection defined by the Public Interest Disclosure Act 1998.

All employees will therefore be protected from victimisation, harassment or disciplinary action as a result of any disclosure which is made in accordance with this policy and the relevant whistleblowing procedures.

Who this policy applies to: All WDS employees and any individuals working on behalf of WDS.

2. Minimum Requirements

Role	Principal Responsibilities
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| Business Management | <ul style="list-style-type: none"> • Establishing procedures that ensure: <ul style="list-style-type: none"> ○ Individuals feel certain that they are able to talk to someone confidentially, without fear of reprisals. ○ All disclosures made under this <i>Whistleblowing</i> Policy are treated in the strictest of confidence, unless disclosure by WDS is required to be made by law. ○ All disclosures are investigated to determine the most appropriate course of action. ○ No employee is subject to any disciplinary action or suffer any form of detriment having taken actions that fall under the scope of this <i>Whistleblowing</i> Policy, provided such actions were taken in good faith. ○ Designating a <i>Responsible Manager</i> to whom an employee can report his or her concerns. The <i>Responsible Manager</i> must be of sufficient status both to understand the nature of the concerns being raised and also to make suitable enquiry without alerting others to the fact. ○ Protecting at all times the confidentiality of the employee raising the matter, except where permission to disclose is given or is required by law. Maintaining a record of all whistleblowing incidents, including any related correspondence and documentation in a manner which, where required, |
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maintains the anonymity/protects the confidentiality of the disclosing individual (the Whistleblowing Register).

Responsible
Manager

- Protecting at all times the confidentiality of the employee raising the matter, except where permission to disclose is given or is required by law;
- Maintaining a record of all whistleblowing incidents, including any related correspondence and documentation in a manner which, where required, maintains the anonymity/protects the confidentiality of the disclosing individual (the Whistleblowing Register).
- Ensuring that all matters raised under this policy are properly investigated by appropriate individuals;
- Keeping the *whistleblower* informed on the progress of the investigation where appropriate and permitted;
- Ensuring that all matters raised under this policy are reported to Directors, either as part of the investigation or subsequently to ensure appropriate measures are put in place to address the concerns raised.
- Acting as a *Responsible Manager* to whom all employees can discuss their concerns
- Keeping the whistleblower informed on the progress of the investigation where appropriate and permitted

The policy review date is 01/Oct/2024

John Durban

Director

Signed:



Date: 01/Oct/2021