



## Purpose

the SES Group is committed to ensuring that policies and procedures in place adhere to statutory requirements.

The company wants all staff to feel confident that they can expose wrongdoing without any risk to themselves.

The company will not tolerate malpractice and attaches extreme importance to identifying and remedying any malpractice issues raised.

## Scope

This policy applies to all workers and employees of the SES Group.

## Principles

This policy will apply in cases where you genuinely and in good faith believe that one of the following sets of circumstances is occurring, has occurred or may occur within the organisation:

- A crime or breach of rules or law including fraud and corruption
- A failure to comply with any legal obligation
- A miscarriage of justice
- The endangering of an individual's health & safety
- Damages to the environment
- Deliberate concealment of information relating to any of the above
- Misuse of information to further private interests or gain an unfair advantage
- Improper or unethical conduct including discrimination

These non-exhaustive examples are known as Qualifying Disclosures and normally relate to issues that affect other people. Issues concerned with your own employment should be addressed through the company Grievance Policy & Procedure.

## Procedure

### Stage 1

If you have a concern you should in the first instance raise it in confidence by talking to your line manager, if you feel the matter has not been dealt with by raising it verbally you should then raise it in writing with your line manager. If you feel unable to raise the matter through your line manager, then you should contact the HR department who will advise you of the most appropriate manager whom you should contact in confidence to express your concern.

### Stage 2

If the above channels are not appropriate then you should raise the matter in confidence in writing to the Managing Director.

### Stage 3

Only where there are reasonable grounds why none of the above stages can be used should you contact an outside agency.

The policy will apply where a disclosure is made in good faith and where you believe the information and any allegation contained in it are substantially true. Any disclosure made in bad faith (for instance, to cause disruption within the company), or which contain information or allegations that you do not believe to be substantially true, will constitute a disciplinary offence and may be regarded as gross misconduct.

All information that is provided will be treated confidentially as far as possible, however you must be aware that action taken as a result of the report may lead to your identity being revealed.

Name:	Tony Ball
Signature:	
Date:	16 <sup>th</sup> October 2019