

Document Title

Whistle Blowing Policy

Overview and Purpose

At BCN Group, we are committed to the highest standards of openness, integrity, and accountability. We expect all our employees, partners, and suppliers to maintain these high standards.

The purpose of this policy is to provide a secure channel for individuals to report serious concerns about wrongdoing or malpractice within the company without fear of reprisal or victimisation.

Who can raise a concern under this Policy?

The Policy applies to all:

- Contractors, consultants, and agency staff
- Suppliers, vendors, and business partners
- Former employees and job applicants

Internal employees should refer to the internal Whistleblowing Policy located in the Employee Handbook

What should be reported?

Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work. This must be in the public interest. You should use this policy to report:

- Committing a criminal offence.
- Failing to comply with a legal obligation.
- A miscarriage of justice.
- Endangering the health and safety of an individual.
- Environmental damage.
- Sexual harassment.
- Concealing any information relating to the above

This list is not exhaustive.

How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)
- Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within BCN Group and there are reasonable grounds for your concern.
- You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.
- You may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

Raising a Concern

We encourage you to report your concerns as soon as possible. You can submit a report through any of the following channels:

- By email: Marked for a member of the Exec, Senior Leadership team or the People Team and send to HR@bcn.co.uk
- By Post: Mark your envelope "Strictly Confidential – To be opened by the Head of Compliance only" and send to: Second Floor, Building 4, Manchester Green, 331 Styal Road, Manchester, M22 5LW.
- By Phone: Ask to speak to our Internal Compliance Team – 0345 095 7000

Confidentiality and anonymity

We understand that making a report can be difficult. We will treat your disclosure with the utmost confidentiality. Your identity will only be shared with the small team investigating the matter, on a strict need-to-know basis.

You may choose to report anonymously. Please note that while we investigate all anonymous reports, it is much harder to look into allegations if we cannot contact you for follow-up questions or further evidence.

Protection for Whistleblowers

We encourage anyone with genuine concerns about wrongdoing to speak up. You do not need absolute proof to make a report, provided you reasonably believe the information is true and accurate. We can assure you that you will not suffer any detrimental treatment, retaliation, or harassment because of raising a genuine concern in good faith.

Knowingly false claims

Our reporting channels must not be misused. If an investigation reveals that a report was made maliciously, vexatiously, or with the knowledge that the allegations were completely false:

For Employees: This will be treated as gross misconduct and will result in disciplinary action, up to and including immediate dismissal.

For Suppliers and Third Parties: This will be treated as a material breach of contract, which may result in the immediate termination of our business relationship, removal from our vendor list, and potential legal action.

How we handle reports

1. Acknowledgment: We will acknowledge receipt of your report within 5-7 working days, provided you have shared your contact details.
2. Assessment: Our Compliance team will review the details to determine if a formal investigation is required.
3. Investigation: If necessary, an independent internal or external investigator will be appointed.
4. Outcome: Where appropriate, and within the bounds of confidentiality, we will inform you of the progress and outcome of the investigation.

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Document Revision

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QMS-223	7	May 26	Hannah Dodson	Annual Review

Document Management

Responsibility	Owner
CPO	Head of HR

ISO Applicable?

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No	No	

Confidentiality

BCN Group Ltd	Client	Proprietary	Public
Yes	No	No	Yes

Used in IO
No

Document reference key

QMS – 9001 – Quality Management System
ISMS – 27001 – Information Security Management System
IMS – 9001 & 27001 – Integrated Management System
BCN – BCN process or procedure

Read Only Copy – See Policies & Procedures repository for latest revision.