

COMPANY POLICY DOCUMENT
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Introduction

This document provides Group company policy, which applies to staff within the divisions and businesses of the Stobart Group.

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

1. About this policy

This policy is designed to enable employees, officers, consultants, contractors, casual workers and agency workers of the Group ("staff") to raise serious legitimate concerns internally at a high level.

This policy is a mechanism for all staff to voice concerns in a responsible and effective manner. Where an individual discovers information, which they honestly believe shows serious malpractice or wrongdoing within the organisation, then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

This policy is intended to assist individuals who honestly believe they have discovered serious malpractice or impropriety. It is not designed to question financial or business decisions taken by the Group in the ordinary course of business nor should it be used to raise any matters which would normally be considered under the Group's harassment, grievance or disciplinary procedures or Health and Safety Policies. Minor incidents should be dealt with through normal line management and wherever possible employees should approach their line manager in the first instance to discuss their concerns.

2.1 What is whistleblowing?

Whistleblowing is the disclosure of information, which relates to suspected wrongdoing or dangers at work. This may include:

- (a) criminal activity;
- (b) failure to comply with any legal or professional obligation or regulatory requirements;
- (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) damage to the environment;

- (f) financial fraud or mismanagement;
- (g) negligence;
- (h) conduct likely to damage our reputation;
- (i) unauthorised disclosure of confidential information;
- (j) the deliberate concealment of any of the above matters.

2.2 Safeguards

2.2.1 Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and the Group is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business at the earliest possible stage in accordance with this policy.

2.2.2 Protection

This policy is designed to offer protection to staff who legitimately and properly disclose such concerns (a "whistleblower"). Disclosing a genuine concern can be made without fear of reprisal and will not affect the whistleblower's employment within the Group.

Disclosures must, however be made:

- In the public interest
- In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety
- To an appropriate person (see section 2.2.6 below)

The Group will not tolerate harassment or victimisation of a legitimate whistleblower, which will be treated as a disciplinary offence.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, your terms and conditions of employment, working arrangements or organisational changes. In those cases, you should use the Grievance Policy.

2.2.3 Untrue Allegations

If an individual discloses information which is found subsequently not to be correct no action will be taken against the whistleblower as long as the whistleblower honestly and reasonably believed that the information and any allegation raised in it are substantially true. In making a disclosure the whistleblower should exercise due care to ensure the accuracy of the information. False and malicious allegations may be treated as a disciplinary offence.

2.2.4 Anonymous Allegations

The Group encourages individuals to put their name to any disclosures they make. Proper investigation may be made more difficult or impossible if we cannot obtain sufficient information from you. It is also more difficult to establish whether any allegations are credible.

2.2.5 Confidentiality

The Group will endeavour to treat all such disclosures made in accordance with this policy in a confidential and sensitive manner. The identity of a whistleblower may be kept confidential so long as it does not hinder or frustrate any investigation. However, the whistleblower may need to provide a statement as part of the evidence required.

2.2.6 Procedures for Making a Disclosure

Disclosures under this policy should in most circumstances be made to your Line Manager in the first instance. Your Line Manager may be able to resolve the issue. If you do not feel able to make a disclosure to your Line Manager, or if the disclosure relates to your Line Manager, then a disclosure can be made to an appropriate Senior Executive in the division where the individual works.

2.2.8 Investigations

We may arrange a meeting with you to discuss your concerns. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with this matter.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter and external advisers. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

We will deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

2.2.9 External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. You should not find it necessary to alert anyone externally before raising the concern internally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline ((020) 7404 6609) www.pcaaw.co.uk.

2.2.10 Protection and support for whistleblowers

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chairman of the Audit Committee immediately.

CONTACT DETAILS

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