

Public Interest Disclosure (Whistleblowing)

GM Floor Screeds Ltd recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the company's success ensured. This policy is designed to provide guidance to all those who work with or within the company, including casual and temporary staff, who may from time to time feel that they need to raise certain issues relating to the company with someone in confidence.

Any person who in the public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure is a disciplinary offence.

This policy applies where you reasonably believe that one of the following set of circumstance is occurring, has occurred, or may occur within the company and that your disclosure is in the public interest, such as:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- A miscarriage of justice has occurred, is occurring or is likely to occur.
- The health and safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- 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.

It is not necessary that you prove the breach or failure that you are alleging has occurred or is likely to occur, you may simply raise a reasonable suspicion. However, you should note that you will not be protected from the consequences of making such a disclosure if, by doing so, you commit a criminal offence.

If you believe that any of the above practices are happening in the Company, the following procedure should be followed:

1. Initially raise any issues with either of the 2 employees stated; Andy Millward at Andy@GMFloorScreeds.com or Victoria Millward at Victoria@GMFloorScreeds.com. These employees will not discuss between themselves and they will treat the matter in confidence. There will always be at least 2 separate employees (with different pronouns and ages), so there is a wider spectrum of choice for the employee reporting/discussing issue.
2. If it is not appropriate to raise the issues with Andrew Millward or Victoria Millward, the issue may then be raised to the companies Director Gary Millward.
3. It is likely that an investigation may be necessary, and you may be required to attend an investigatory meeting as a witness. At this meeting the chance is given to explain fully the nature and extent of what the problem is believed to be. In this meeting another colleague (who is employed by GM Floor Screeds Ltd) is allowed to join to help explain the situation more clearly if requested.
4. Depending on the nature of the complaint, it may not be possible to find an immediate solution, but all concerns will be investigated as quickly as is reasonably possible, and, where possible, providing such disclosure does not breach confidentiality, it will be advised of the outcome of the investigation in due course. Once completed and appropriate action has been taken, although the employee raising the issue may not be informed of the specific details of the action that has been taken and this is down to the company's discretion.
5. Where it is necessary for the reporting employees disclosure, the investigative meeting minutes will be supplied to an employee as part of the evidence supporting disciplinary action, appropriate steps will be taken to ensure that your working environment and/or working relationships are not prejudiced by the fact of the disclosure.
6. If one remains dissatisfied with the outcome, said employee has the right to express concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 2014, or any statute or statutory instrument which subsequently supersedes this legislation.

7. If the employee reasonably believes that the relevant failure as listed in any of the above practices relates wholly or mainly to the conduct of a person other than someone in the Company, or any other matter for which a person other than the Company has legal responsibility, then the employee should make that disclosure to that other person.

8. An employee may make such a disclosure to Protect, the leading authority on public interest whistleblowing if you consider that it has an interest in the matter and, despite the best efforts of the Company, you believe that disclosure within the Company is inappropriate or has been unsuccessful. Disclosures made to legal advisors in the course of obtaining legal advice will be protected.

If any disclosure concerns information which you do not substantially believe is true or is made in bad faith (for instance in order to cause disruption within the Company), or indeed if the disclosure is made for personal gain, then you may become subject to action under the disciplinary procedure, which could include dismissal. While the Company hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances and each issue will be investigated and treated with its own facts in a case by case scenario.

GM Floor Screeds Ltd

Reviewed and amended on 28/09/23

Due for review on 27/09/24

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Name	Department	Signature	Date

