

WHISTLEBLOWING POLICY

1. Introduction

1.1 Employees, Clients or Suppliers are often the first to realise that there may be something seriously wrong within Belmont Press Ltd. However, they may not express concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 The Company is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we encourage employees, suppliers and others with serious concerns about any aspect of the Company's work to come forward and voice those concerns. This policy document also makes it clear that employees can do so without fear of reprisals.

1.3 This Whistleblowing Policy has been produced in accordance with the provisions of the Public Interest Disclosure Act 1998.

1.4 This policy supports the Company's Anti-Fraud and Corruption Strategy. It is intended to encourage and enable employees and suppliers to raise serious concerns within the Company, irrespective of seniority, rank or status, rather than overlooking a problem or reporting the matter externally. Similarly, anyone else who has a genuine concern about the conduct of an employee is encouraged to report their concerns. It is recognised that certain cases will have to proceed on a confidential basis.

1.5 This policy does not replace the Company Complaints Procedure, the Harassment Policy or the Disciplinary Procedure.

2. Aims and Scope of this Policy

2.1 There are existing procedures in place to enable employees to make complaints about service quality or lodge a grievance relating to their own employment. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of those procedures, including concerns by suppliers or customers.

2.2 That concern may be about something that:

- Is unlawful;
- Is contrary to the Company's Standing Orders or policies;
- Falls below established standards or practice; or
- Amounts to improper conduct.

For example (this list is not exhaustive):

- Malpractice or ill treatment of a client, supplier or employee;
- A criminal offence has been committed, is being committed or is likely to be committed;
- Suspected fraud;
- Disregard for legislation, particularly in relation to health and safety at work;
- Breach of Financial Regulations, Contract Standing Orders, ICT Security Policy;
- Showing undue favour over a contractual matter or to a job applicant;
- Falsification or manipulation of financial records;
- A breach of any code of conduct or protocol;

Information on any of the above has been, is being, or is likely to be concealed.

2.3 The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions applied.

2.4 The earlier concerns are raised; the easier it is to take action. Anyone with a concern about an employee's conduct but is unsure whether a particular practice is unacceptable to the Company is encouraged to ask either the Managing Director, the Commercial Director, the relevant Commercial Manager, the Personnel Manager or Line Manager.

3. Safeguards

Harassment or Victimisation

3.1 The Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Company will not tolerate harassment or victimisation (including informal pressures) and will take action to protect employees when they raise a concern in good faith. The Company will treat any claims of harassment or victimisation seriously and will investigate the complaint in accordance with the Company's Policy Statement on Harassment at Work, which could lead to disciplinary proceedings.

3.2 This does not mean that if, where an employee is already the subject of disciplinary or redundancy procedures, those procedures will be halted as a result of their whistleblowing.

Confidentiality

The Company will do its best to protect a whistleblowers identity when they raise a concern and do not want their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by an employee may be required as part of the evidence.

Anonymous Allegations

3.4 This policy encourages whistleblowers to put their name to their allegation whenever possible. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Company.

3.5 In exercising the discretion, the factors to be taken into account would include the:

Seriousness of the issues raised;
Credibility of the concern; and
Likelihood of being able to, independently, confirm the allegation.

Untrue Allegations

3.6 If an employee or supplier makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is found to be malicious, frivolous or vexatious, or gives personal gain to the whistleblower as a result of the allegation, disciplinary action may be taken against.

4. How to raise a concern

4.1 Anyone wishing to raise a concern that falls within the scope of other Company procedures will not be dealt with in this procedure, but will be advised on the appropriate procedure to use. Employees will still receive protection as detailed in this policy.

4.2 If an employee/supplier has a concern they should not:

Do nothing;

Be afraid to raise the concerns – they will not suffer any recriminations from the Company as a result of raising a legitimate concern;

Raise vexatious concerns or concerns they know to be untrue – they could be disciplined if they do;

Directly approach or accuse individuals they have concerns about;

Try to investigate the matter themselves. There are special rules surrounding the gathering of evidence for use in criminal cases. Any attempt to gather evidence by anyone not familiar with these rules could destroy the case;

Convey their concerns to anyone not in the list below (there is a duty to maintain the confidentiality of the matter under investigation).

4.3 If fraud or corruption is suspected, then the matter should be reported without delay. Employees should report to their Line/Commercial Manager at the outset and retain all evidence. If it is thought that the Line/Commercial Manager may be involved, or that there may be a conflict of interest, the matter should be reported directly to a more senior employee, or to the:

Chief Commercial Manager;

Commercial Director;

Managing Director;

4.4 Any clients, suppliers or other person should inform either the Managing Director or the Commercial Director of their concerns.

4.5 If possible, concerns should be raised in writing, to ensure those conducting investigations properly understand and investigate the allegations. Written allegations should include the background, history and nature of the concern (including names and relevant dates and locations, where applicable) and the reason why the author is particularly concerned about the situation.

4.6 If it is not possible to put a concern in writing, the concern can be raised either by telephone or by meeting the appropriate person as set out in Section 4.3 above. The earlier a concern is raised, the easier it is to take action.

4.7 An employee may invite a trade union representative or work colleague to raise a matter on their behalf.

4.8 Although whistleblowers are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

4.9 If in doubt, Public Concern at Work (www.pcaw.co.uk) will give confidential free and totally independent advice on how to proceed (contact helpline@pcaw.co.uk or telephone 020 7404 6609).

4.10 Concerns can also be raised anonymously (by letter or telephone), although these are normally given less weight than those concerns raised more formally.

5. How the Company will respond

5.1 The action taken by the Company will depend on the nature of the concern and may be:

Resolved by agreed action without the need for investigation;

Investigated internally;
Referred to the police or another investigating agency;

5.2 As soon as a fraud or act of corruption is reported, the person receiving the concern (see 3.2 above) should:

Obtain a written record of the concerns from the person making the allegations, or in cases where they have discovered the potential fraud, prepare a written report themselves. This should include:

- Background details and nature of the suspicions (including relevant names, dates and locations);
- Details of the job and areas of responsibility of the individuals implicated;
- Why the person raising the matter is concerned;
- Action taken to date, if any;
- A description of the systems, controls and procedures that should be operating within the area where the fraud is alleged to be taking place.

In cases involving employees contact the relevant person as outlined in section 4.3. In other cases contact the police or another investigating agency as soon as possible to discuss the seriousness and factual basis of the allegations and the next steps to be taken;

Take care, at this stage, to ensure that the suspect(s) are not alerted to the potential investigation and the confidentiality of informants is not compromised;

Under no circumstances take any action to investigate the allegations themselves, or allow employees to do so, without sanction or guidance from the appropriate person/agency. This includes interviewing, or observing suspects in connection with the suspected act(s). This is to ensure that evidence is collected in a way that complies with relevant legislation and does not compromise the investigation and/or subsequent disciplinary procedures/prosecutions.

5.3 The appropriate person will then discuss the case with the Managing Director, the Commercial Director (providing there is no conflict of interest), or police/another investigating agency. The discussion will need to consider whether there needs to be an initial covert investigation. In order to initiate disciplinary/criminal proceedings against suspected financial misconduct, it is essential that evidence is secured in a legally admissible form, without alerting suspects at the outset of the investigation.

There are two main reasons for this:

Evidence may be hidden or removed;

To avoid wrongly damaging the reputation of anyone suspected but subsequently found innocent of wrongful conduct.

5.4 Following this discussion and if it is decided that further information is required, the relevant party should appoint one or more Investigating Officers. The role of the Investigating Officer(s) is to:

Identify the issues;

Establish the facts (e.g. Who, Why, Where, What, When and How?);

Decide whether there is a case to answer.

5.5 If an investigation is required, the relevant party will write to the whistleblower:

Acknowledging that an investigation will be carried out, giving details as to who the investigating officer(s) will be;

Give an estimate of how long it will take to provide a final response;

Telling them whether any initial enquiries have been made;

Advising them that the investigation will be carried out in the strictest confidence.

If there is to be no investigation, give the reasons as to why not.

6. How the matter can be taken further

6.1 This policy is intended to provide an avenue to raise concerns within Belmont Press Ltd. The Company hopes that any whistleblower will be satisfied. If they are not, and feel that it is right to take the matter outside the Company, the following are possible contact points:

An External Auditor;
Relevant professional bodies or regulatory organisations;
A Solicitor;
The police;
Public Concern at Work.

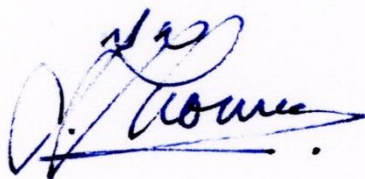
If a client, supplier or employee does take this matter outside the Company, they need to ensure that they do not disclose confidential information or that disclosure would be privileged. The client, supplier or employee should check with the contact point about that.

7. The Law

7.1 This policy has been written to take account of the Public Interest Disclosure Act 1998, which protects workers making disclosures about certain matters of concern, where those disclosures are made in accordance with the Act's provisions.

7.2 The Act is incorporated into the Employments Rights Act 1996, which already protects employees who take action over, or raise concerns about health and safety at work.

Signed.



Date: 07 / 02 / 2014

Trevor Thomas
Managing Director