

Whistleblowing Policy

The policy sets out nagels commitment to:

- promote responsibility for the environment within the organisation and communicate and implement this policy
- reduce the use of energy, water and other resources and components
- minimise waste by reduction, re-use, recycling and process improvements
- ensure all relevant environmental legislation/regulation EU and UK is followed
- policies and services are developed in a way that is realistic, manageable and sustainable
- identify and provide appropriate training, advice and information for staff and encourage them to develop new ideas and initiatives
- provide sufficient resources to meet the objectives of this policy

WBP EXPLAINED – YOUR RIGHTS AND OUR COMMITMENT

1. Purpose and Scope

1.1 All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. Nagels believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation Nagels believes it can help prevent malpractice - prevention is better than cure. That is the aim of this policy. Nagels is committed to ensuring that all types of malpractice are reported, investigated and stopped.

1.2 By encouraging a culture of openness Nagels wants to encourage you to raise issues which concern you at work. You may be worried that by reporting such issues you will be opening yourself up to victimisation or detriment, or risking your job security; that is quite understandable. However, all staff now enjoy statutory protection if they raise concerns in the right way. This policy is designed to give you that opportunity and protection. Provided you are acting in good faith, it does not matter if you are mistaken. There is no question of you having to prove anything. If you are uncertain as to whether your issue is one which would be covered by this policy, you should speak with Lee Minter - Managing Director.

1.3 If there is anything which you think Nagels should know about please use the procedure outlined in this policy. By knowing about malpractice at an early stage Nagels stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please, do not hesitate to 'blow the whistle' on malpractice.

Note: This policy is not the procedure for general grievances. If you have a complaint about your own personal circumstances then you should use the normal grievance procedure. If you have concerns about malpractice within the organisation then you should use the procedure outlined in this policy.

1.4 Whistle-blowing may include (but is not limited to) the following issues:

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Bribery
- Financial fraud or mismanagement
- Negligence
- Breach of our internal policies and procedures
- Conduct likely to damage our reputation
- Unauthorised disclosure of confidential information
- The deliberate concealment of any of the above

2 Policy

2.1 Our guarantee

2.1.1 Nagels is committed to this policy. If you use this policy to raise a concern Nagels gives you its assurance that you will not suffer any form of retribution, victimisation or detriment. Nagels will treat your concern seriously and act according to this policy. You will not be asked to prove anything. If you ask for a matter to be treated in confidence Nagels will respect your request and only make disclosures with your consent. You will be given feedback on any investigation and Nagels will be sensitive to any concerns you may have as a result of any steps taken under this procedure.

2.1.2 We do not encourage the making of disclosures anonymously, as this can hinder the proper investigation and make the gathering of vital information difficult and on occasions impossible. It can also make establishing whether the report has been made in good faith and whether the allegations have credibility difficult to ascertain. If you are concerned about reprisals as a consequence of whistle-blowing or have suffered reprisals as a consequence of whistle-blowing please speak with Lee Minter - Managing Director so that appropriate measures can be taken to ensure confidentiality and protection for you as a whistle-blower.

2.1.3 Staff must not retaliate against whistle-blowers in any way. Anyone who is found to have retaliated will be subject to Nagels' disciplinary policy.

2.2 How to raise your concern internally

2.2.1 Tell the Department Head

If you are concerned about any form of malpractice, you should normally first raise the issue with your immediate superior. There is no special procedure for doing this - you can tell that person about the problem or put it in writing if you prefer.

2.2.2 If you feel unable to tell your Department Head

If you feel you cannot tell your department head, for whatever reason, please raise the issue with one of the Directors.

2.2.3 If you still have concerns

If you have raised your concerns and you are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with Lee Minter - Managing Director.

3 How Nagels will respond

3.1 After you have raised your concern Nagels will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. You may be required to attend further meetings during the process.

3.2 As far as possible, Nagels will keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, Nagels will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

3.3 If Nagels concludes following investigation that a whistle-blower has made a disclosure maliciously or in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary proceedings.

4 Raising your concern externally (exceptional cases)

4.1 The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. Nagels would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take. If you are considering taking action externally, you should contact your Head of Department or Lee Minter - Managing Director for guidance.

4.2 However, if for whatever reason, you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with the appropriate regulator.

If you consider that the Company has not handled a whistleblowing matter satisfactorily or alternatively you believe you cannot raise the concern with one of the directors, you may consider raising your complaint with one of the persons or bodies listed on the following website

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

This list gives the prescribed persons and bodies with whom you can raise a concern.

Caution: If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making wider disclosure by reporting the matter to the police or to the media, for example. However, whistle-blowers who make wider disclosures of this type will only be protected (from victimisation and suffering detriment) in certain circumstances. Nagels recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.

5 Responsibility for Success of this Policy

- 5.1 The Directors of Nagels shall have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 5.2 The Managing Director has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 5.3 The Managing Director, in conjunction with the directors, should review this policy from a legal and operational perspective at least once a year.
- 5.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Managing Director.

Contacts

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