

POLICIES

WHISTLEBLOWING

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within the Company and alerts the employer or the relevant authority accordingly.

The Public Interest Disclosure Act 1998 gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

ACTIONS TO BE TAKEN BY THE INDIVIDUAL

If an individual knows or suspects that some wrongdoing is occurring within the Company, s/he should raise the matter immediately with the relevant manager. If the individual does not know who to approach, s/he should, in the first instance, talk to his or her line manager.

POSSIBLE SITUATIONS

Although this list is not exhaustive, examples of situations in which it might be appropriate for an individual to report a wrongdoing include:

- a breach, or potential breach, of health and safety legislation
- financial irregularities
- harassment of a colleague, customer or other individual
- damage to the environment
- the committing of a criminal offence
- an act of bribery
- deliberate concealment of any of the above.

ACTION TO BE TAKEN BY THE MANAGER

Any manager who is informed by an individual of potential wrongdoing will take immediate action to investigate the situation. In doing so, the manager will take every possible step to maintain the anonymity of the individual who has made the allegation of wrongdoing.

The individual who has raised the issue will be kept informed of any investigation that is taking place. The individual will also be informed of the outcome of the investigation. It might not always be appropriate to tell the individual the detail of any action that is taken, but the individual will be informed if action is taken.

SIGNED:
CEO



Document Number: ML-POL-008
Date Issued: September 2025
Review Due: September 2026
Version No: 7.0

