



Whistleblowing Policy

Introduction

This Whistleblowing Policy outlines the procedures and protections for employees, contractors, suppliers, and other stakeholders to report concerns regarding unethical, illegal, or unsafe practices within the company. This policy is designed to align with SEDEX (Supplier Ethical Data Exchange) and SMETA (Sedex Members Ethical Trade Audit) guidelines, as well as comply with UK legislation, including the Public Interest Disclosure Act 1998.

Scope

This policy applies to all employees, contractors, suppliers, and any other stakeholders associated with the company. It covers a wide range of concerns, including but not limited to:

- Violations of laws or regulations.
- Unethical business practices.
- Health and safety risks, including those that could affect the public.
- Environmental damage.
- Financial misconduct, such as fraud or corruption.
- Human rights abuses, including modern slavery, child labour, and discrimination.
- Breaches of the company's ethical standards or policies.

Policy Statement

The company is committed to maintaining the highest standards of integrity, transparency, and accountability. It encourages all stakeholders to report any concerns related to unethical or illegal practices without fear of retaliation. All reports will be treated seriously, investigated promptly, and dealt with in a fair and confidential manner.

Legal Framework

This policy is guided by the following UK legislation and international standards:

- **Public Interest Disclosure Act 1998:** Provides legal protection for whistleblowers in the UK.
- **Equality Act 2010:** Ensures protection against discrimination and promotes equality.
- **Modern Slavery Act 2015:** Requires companies to report on measures to prevent slavery and human trafficking in their operations.
- **SEDEX and SMETA Guidelines:** Establish standards for ethical business practices and social accountability.

Key Principles

1. **Confidentiality:** All reports made under this policy will be handled confidentially. The identity of the whistleblower will be protected to the fullest extent possible.
2. **Non-Retaliation:** The company strictly prohibits retaliation against anyone who reports concerns in good faith. Any form of harassment, victimization, or adverse employment consequences against a whistleblower will result in disciplinary action.





3. **Transparency and Accountability:** The company is committed to investigating all concerns thoroughly and impartially. Outcomes will be communicated to the whistleblower where appropriate, and corrective actions will be taken as necessary.
4. **Good Faith Reporting:** Whistleblowers are expected to make reports in good faith, with a genuine belief that the information provided is true. Malicious or knowingly false reports will be treated as a serious disciplinary matter.

Reporting Procedure

1. Making a Report

- Concerns can be reported through several channels, including:
 - **Whistleblowing Hotline:** A dedicated, confidential hotline [01924 475511].
 - **Email:** Reports can be emailed to a designated whistleblowing officer at [info@thevcg.com].
 - **In Writing:** Written reports can be submitted to [Unit 1b Greenhill Mills, Grange Road, Batley, WF17 6LH].
- Reports can be made anonymously; however, providing contact details can assist in the investigation process.

2. Initial Assessment

- Upon receiving a report, the Whistleblowing Officer will conduct an initial assessment to determine the nature and severity of the concern.
- If the report falls within the scope of this policy, it will be escalated for further investigation. If it does not, the whistleblower will be informed, and guidance on alternative actions may be provided.

3. Investigation

- An impartial and thorough investigation will be conducted by an appointed investigator or an external party if necessary.
- The scope and timeline of the investigation will depend on the nature of the concern. The whistleblower may be contacted for further information during this process.

4. Outcome and Actions

- Upon conclusion of the investigation, a report will be prepared detailing the findings and any recommended actions.
- If the investigation confirms the concerns, appropriate corrective actions will be taken, which may include disciplinary measures, changes to company policies, or notification to relevant authorities.
- The whistleblower will be informed of the outcome where it is appropriate and safe to do so.

5. Record Keeping

- All reports and investigations will be documented and securely stored in accordance with data protection laws.
- Records will be kept for a minimum of five years or as required by law and may be reviewed by external auditors or regulators.





Protection for Whistleblowers

- **Legal Protection:** Whistleblowers are protected under the Public Interest Disclosure Act 1998. This means that they cannot be dismissed, demoted, or suffer any other detriment as a result of making a protected disclosure.
- **Support:** The company will provide support to whistleblowers during and after the investigation process. This may include counseling services, legal advice, or other forms of assistance.
- **Anonymity:** While anonymous reports are accepted, whistleblowers are encouraged to provide their identity to facilitate the investigation. However, the company will respect the anonymity of whistleblowers who request it.

Training and Awareness

- All employees and contractors will receive regular training on this policy and their rights and responsibilities under it.
- The company will also ensure that all suppliers and third-party partners are aware of this policy and are encouraged to report any concerns through the available channels.
- Information about this policy will be accessible to all stakeholders, and reminders will be periodically communicated.

Monitoring and Review

- The effectiveness of this policy will be reviewed annually or following any significant incidents or changes in legislation.
- Feedback from whistleblowers, employees, and other stakeholders will be used to improve the policy and its implementation.
- The company will ensure compliance with SEDEX and SMETA standards through regular audits and reviews of its whistleblowing procedures.

Contact Information

For any concerns, questions, or further information regarding this policy, please contact the Whistleblowing Officer Adam Poules

Conclusion

The company is committed to fostering a culture of openness and accountability. By adhering to this Whistleblowing Policy, the company ensures that ethical standards are upheld, and that any concerns raised by stakeholders are addressed with the seriousness they deserve.

