

Whistleblowing Policy

September 2023



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Responsible: Company Secretary

1. About this policy

Introduction

1.1 At Gridworks we are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them if they do occur. The Board is committed to running Gridworks in the best possible way and to do so we need your help.

Summary

1.2 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying serious wrongdoings in the workplace and to:

- Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- Provide staff with guidance as to how to raise those concerns; and
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy applies to all employees, officers, consultants, contractors, interns, casual workers, and agency workers of Gridworks. If you have a concern about a serious matter, including those described in section 2, **please speak up**.

1.4 If something is troubling you which you think we should know about or look into, please use this policy. If, however, you wish to make a complaint about your employment or how you have been treated, please use the Grievance policy in the Employment Handbook. This policy is primarily for concerns where the interests of others or of Gridworks itself are at risk.

If in doubt – speak up!

and see section 3, for how to raise a whistleblowing concern.

2. What is whistleblowing?

2.1 **Whistleblowing** is the disclosure of information which relates to significant suspected wrongdoing or material dangers at work. These could include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery or corruption;
- facilitating tax evasion;
- financial fraud or mismanagement;
- breach of our internal policies and procedures, including the Gridwork's Code of Ethics;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- breaches of the BII's Policy on Responsible Investing; and
- the deliberate concealment of any of the above matters.

2.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any significant and genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

2.3 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Champion, whose contact details are at the end of this policy.

3. Raising a whistleblowing concern

3.1 We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Champion.

3.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Champion (Stewart Hicks, Non-Executive Director and Chairman of the Audit and Risk Committee), whose contact details are at the end of this policy.

- 3.3 In most cases we will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 3.4 We will usually take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

4. Confidentiality

- 4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 4.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should discuss this with the Whistleblowing Champion and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential advice line. Their contact details are at the end of this policy.

5. Investigation and outcome

- 5.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment.
- 5.2 In some cases we may appoint an investigator or team of investigators, including staff or an external investigator with relevant experience of investigations or specialist knowledge of the subject matter. Investigators may make recommendations for change, to enable us to minimise the risk of future wrongdoing.
- 5.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 5.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

6. If you are not satisfied

- 6.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 6.2 If you are not happy with the way in which your concern has been handled, you can raise it with the Whistleblowing Champion. Alternatively, you may contact the Chairman of the Board.

7. External disclosures

- 7.1 As the aim of this policy is to provide an internal mechanism for reporting, investigating and remedying serious wrongdoings in the workplace, in most cases you should not find it necessary to alert anyone externally.
- 7.2 However, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential advice line. They also have a list of prescribed regulators for reporting certain types of concern to. Their contact details are at the end of this policy.
- 7.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or the Whistleblowing Champion for guidance.

8. Protection and support for whistleblowers

- 8.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 8.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Champion immediately. If the matter is not remedied, you should raise it formally in accordance with policies in the Employment

Handbook.

- 8.3** You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 8.4** An independent and confidential advice line offered by Protect is available to whistleblowers who raise concerns under this policy. Their contact details are at the end of this policy.

9. Personnel responsible for the policy

- 9.1** Gridworks seeks to ensure that the whistleblower process is subject to independent external oversight and the Non-Executive Director and Chairman of the Audit and Risk Committee, Stewart Hicks, has been appointed as Gridwork's Whistleblower Champion. The Whistleblowing Champion's responsibilities include overseeing the integrity, independence and effectiveness of the Gridwork's policies and procedures on whistleblowing.
- 9.2** The Whistleblowing Champion and the Audit and Risk Committee has overall responsibility for this policy. They will monitor the effectiveness of actions taken in response to any concerns raised under this policy and will review this policy from a legal and operational perspective at least once a year. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 9.3** The Whistleblowing Champion will oversee the handling of disclosures received via the whistleblowing channel, provide reports on concerns raised to the Audit and Risk Committee and will ensure that all managers and other staff receive regular and appropriate training on this policy. The Whistleblowing Champion has received specialist training on dealing with whistleblowing concerns.
- 9.4** All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing or dangers at work. 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 Whistleblowing Champion.

10. Contacts

Whistleblowing Champion (And Chairman of the Audit and Risk Committee)	Stewart Hicks whistleblowing@gridworkspartners.com
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: https://protect-advice-line/ Website: https://protect-advice.org.uk