



IV "WHISTLE BLOWING" POLICY

A. INTRODUCTION

1. The Public Interest Disclosure Act 1998 came into force in July 1999. It was enacted to enable employees to raise their concerns. It gives legal protection to those who honestly and reasonably believe that the information they disclose or the allegations they make are substantially true. In addition, The Company's (Audit, Investigations and Community Enterprise) Act 2004 (effective from April 2005) introduced key changes in respect of the disclosure of information by directors and employees to company auditors. Employees are encouraged to consult the confidential fraud line if they are concerned about the accuracy or scope of information provided to auditors by themselves or by a co-worker.
2. This statutory protection relates to "qualifying disclosures" of information by a worker concerning specified types of wrongdoing or malpractice, such as:
 - ✓ a criminal offence, e.g. fraud
 - ✓ someone's health and safety is in danger
 - ✓ risk or actual damage to the environment
 - ✓ a miscarriage of justice
 - ✓ the company is breaking the law, e.g. doesn't have the right insurance
 - ✓ you believe someone is covering up a wrongdoing.
3. A "qualifying disclosure" is any disclosure of information that the employee reasonably believes tends to show that one or more of the above is occurring, has occurred or is likely to occur. Communication of such information to an individual's employer is termed as being a "protected disclosure".

B. POLICY

1. Anpario is committed to the highest standards of conduct, honesty and accountability. Accordingly, malpractice and wrongdoing in the workplace will not be tolerated and any such bona fide claims will be treated seriously.
2. To enable Anpario to maintain this commitment, any employee who has a genuine belief that there is evidence of malpractice, a danger to the health and safety of anyone associated with this undertaking or wrongdoing within the Organisation is assured that they may raise genuine concerns without fear of dismissal or any other form of disciplinary action or victimisation, recrimination or disadvantage being applied, provided they make their disclosure in good faith.
3. This policy is applicable to all our employees, other workers on our premises, our suppliers and those providing a service to our organisation.
4. In the event that an employee has knowledge of wrong doing or malpractice by another employee or third party, then the employee has a duty to raise the matter as stated in the policy.
5. Any allegations raised will be taken seriously and dealt with quickly.



6. Employees are encouraged to raise any such concern through our internal procedures rather than externally, unless the circumstances are exceptional. This will ensure that the matter is dealt with speedily and at a level appropriate to the nature and seriousness of the allegation.
7. All allegations of malpractice and wrongdoing, together with the responses to them, will be properly recorded and the employee who raised the concern will be informed as to the outcome of any investigation.
8. Where an employee's allegation is discredited no action will be taken against that employee providing the allegation was made in good faith. Any allegations made maliciously or for personal gain may result in disciplinary action being taken against you.
9. This procedure for raising a "whistle blowing" concern internally is separate from our published Grievance Procedure which exists to allow an employee to raise an internal query, grievance, complaint or problem which specifically relates to them as an individual, or to them and a group of colleagues.
10. A disclosure may be made verbally or in writing and should include as much factual information relating to the concern as possible, e.g. background information, relevant dates and a statement of who is believed to be involved.
11. As far as possible, all reports received from a whistle-blower shall be treated confidentially. However, whistle-blowers should be aware that actions taken in consequence of their report may inevitably result in their identity being revealed, either by inference or in subsequent legal or disciplinary proceedings.
12. The presentation of anonymous reports is not encouraged as it places barriers in the way of thorough investigation. Whistle-blowers are urged to reveal their identity so that they may be contacted for additional information. Anonymous reports that contain sufficient details will not, though, be ignored.

C. INTERNAL PROCEDURE FOR MAKING A DISCLOSURE

1. If you wish to raise any concerns that you may have, you can write or speak to HR. If your concern is about a Director, or if you believe that the issue can only be addressed by the Board of Directors you should speak to the Chairman or Company Secretary both of whom will also brief the Senior Independent Director of any issues raised. You should state clearly, verbally or in writing, that you are lodging an official disclosure under Anpario plc "Whistleblowing" Procedure.

HR may be contacted via:

Post: Manton Wood Enterprise Park
Worksop
Nottinghamshire
S80 2RS
Telephone: 01909 537380



2. Assuming that it is concluded that the disclosure is made in good faith, and there are sufficient grounds or apprehensions for the matter to be taken further, HR or Company Secretary will immediately decide upon the appropriate course of action to be followed and you will be advised of the nature of these investigations (but probably not the full detail). This may include the appointment an individual or individuals to be responsible for investigating the disclosure. Accordingly, you will be written to:
 - a) Acknowledging receipt of your concern and the decision as to whether or not the matter will proceed any further.
 - b) Acknowledging in writing that this is an official disclosure under the Anpario plc "Whistleblowing" Procedure.
3. Assuming that further investigations are undertaken you will be given an indication of the date by which the Company expects to conclude its investigation. You will then be advised of the findings, subject to any legal constraints. You will not be advised of the detail of any disciplinary steps that the Company sees fit to invoke against any employee as a result of its findings as such matters are necessarily confidential.
4. Any employee lodging a disclosure under this procedure may be accompanied at any associated investigative meetings by a colleague or trade union representative, subject to it being accepted by all parties that the components of any internal investigative meeting must be regarded and treated as being strictly confidential.
5. Exceptionally, you may wish to raise the matter externally. If you choose to make a disclosure to a "prescribed person", e.g. the Health and Safety Executive or the police, you should ensure that you:
 - a) make the disclosure in good faith.
 - b) reasonably believe that your concern falls within the description of the issues which the "prescribed person" is authorised to investigate.
 - c) believe that the information disclosed and any allegation contained within it are substantially true.
6. This organisation recognises that there may be matters which cannot be dealt with satisfactorily on an internal basis only and that external authorities will need to become involved.
7. In the event that it is concluded that an employee has deliberately made a false or malicious disclosure in association with a whistleblowing complaint, the matter will be treated as very serious misconduct liable to disciplinary action and sanctions up to and including summary dismissal.