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Whistleblowing Policy

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Author: Marianne Matin

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Distribution List

Name	Organisation	Title	Date

Quality Statement

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Commitment

The Company is committed to conducting its business with honesty and integrity, and to maintaining high standards at all times. 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 extremely important in order to reduce or eliminate such conduct and to address it when it does occur.

Purpose

The aims of this policy are:

- To encourage the raising of concerns of suspected wrongdoing as soon as possible, in the knowledge it will be taken seriously and investigated as appropriate, and confidentiality will be respected.
- To provide guidance as to how to raise those concerns.
- To provide reassurance that genuine concerns may be raised without fear of reprisals, even if they turn out to be mistaken.

Application

The following individuals would be considered an “eligible person” under this policy:

- employees (including officers, managers, and secondees)
- volunteers and interns
- workers contractors, consultants, service providers, suppliers, partners
- former employees.

This policy applies to the Company and all its subsidiaries and their businesses, divisions, and offices (referred to below as “**the Business**”). It also applies across all jurisdictions in which the Business operates. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

Any eligible person who in good faith raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure, or other party that might have been involved in the investigation or as a witness, will not be tolerated.

This policy applies where an eligible person wishes to disclose information which relates to suspected wrongdoing or danger affecting any of the activities of the Business which may include behaviour that is:

- fraudulent;
- illegal;
- corrupt;
- dishonest;
- unethical;
- damaging to the environment;
- contrary to any of the Business’s policies;
- discriminatory;
- harassment and/or bullying of any kind;
- facilitating tax evasion
- the deliberate concealment of any of the above.

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

Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, or service provider.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. You should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate as outlined in the Employee Handbook.

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

It is not necessary that an eligible person proves the breach or failure that they are alleging has occurred or is likely to occur but may simply raise a reasonable suspicion. However, please note that an eligible person will not be protected from the consequences of making such a disclosure if, by doing so, a criminal offence is committed or if the disclosure is motivated by a reason which is not in good faith.

Procedure

We hope that in many cases you will be able to raise any concerns with your line manager (if you are an employee) or your Business contact. 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.

Concerns may be referred to the Whistleblowing Officer. Before referring a disclosure to the Whistleblowing Officer, the line manager or Business contact must:

- take a written record of the facts of the disclosure, including the time and date of the disclosure;
- seek your consent to include your name and contact details in the written record;
- seek your consent to passing on the disclosure; and
- ask you to sign the record of disclosure, where this is practicable.

However, where the matter is more serious, or you feel that your line manager or the Business contact has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a support person to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Investigation and Outcome

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. You may be required to attend additional meetings to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

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.

If the informant is not satisfied with the outcome, the matter can be escalated to a member of the Board. Whilst the Board commits to review the matter, the Business is under no obligation to reopen the investigation.

Should the dissatisfaction still not be resolved an eligible person has the right to express their concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 1999 or any statute or statutory instrument which subsequently supersedes this legislation (UK) or the applicable local Public Interest Disclosure scheme for the eligible person.

This policy will apply where a disclosure is made in good faith and where an eligible person reasonably suspects that the information disclosed, and any allegation contained in it are substantially true. If any disclosure is made in bad faith (for instance, to cause disruption within the Business), or concerns information which an eligible person does not substantially believe is true, or if the disclosure is made for personal gain, then the Business may take action against that person including disciplinary action against employees.

Confidentiality

We hope that you 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.

We do not encourage anonymous disclosures. 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 come forward to the Whistleblowing Officer (or one of the other contact points listed below) and appropriate measures can then be taken to preserve confidentiality. If you are in any

doubt and you are in the UK, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

A disclosure is considered anonymous if:

- the identity of the discloser is not revealed and if no contact details for the discloser are provided; or
- the discloser does not disclose their name but does provide anonymous contact details.

Any information that could potentially identify an anonymous informant will be held in the strictest confidence and will not be shared unless the Business is compelled by law.

Certain senior managers might be alerted to the disclosure as part of the reporting process, or if they are involved in the investigation in some manner.

External Reporting

The aim of this policy is to provide a mechanism for reporting, investigating, and remedying any wrongdoing. In most cases you should not find it necessary to alert anyone externally.

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 external.

In the UK, the independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblower Protection

It is understandable that Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support informants who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure (if you are an employee).

Contacts

Whistleblowing Officer	Robert Cain General Counsel Tel +44 (0) 2392 825 925 Mob +44 (0) 7764 244953 Email: rcain@bell-integration.com
Board	Link to website: Bell Integration Board
Protect (UK) (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk