

Whistleblowing policy

The purpose of the policy and procedure is to outline ways in which all Acorn Waste Management employees can express concerns about malpractice / wrongdoing and to encourage employees to raise these at an early stage and in an appropriate way in line with the Public Interest Disclosure Act 1998.

This policy is in place to reassure staff that it is safe and acceptable to speak up and enable concerns to be raised at an early stage and in the right way. Rather than wait for proof, Acorn Waste Management would prefer that concerns are raised when it is still an active concern.

This policy is intended to encourage all Acorn Waste Management employees to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution.

1. The Whistle-blower should promptly report the suspected or actual event to his/her supervisor.
2. If the whistle-blower would be uncomfortable or otherwise reluctant to report to his/her line manager, then the whistle-blower could report the event to the SHEQ & HR Officer or director level of management, including direct to the Managing Director.
3. The whistle-blower can report the event with his/her identity or anonymously.
4. The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the company.
5. A whistle-blower who makes a report that is not done in good faith is subject to discipline, including termination of employment or other legal means to protect the reputation of the company and its staff.
6. Anyone who retaliates against the whistle-blower (who reported an event in good faith) will be subject to discipline, including termination of employment.
7. Crimes against person or property, such as assault, burglary, etc., should immediately be reported to local law enforcement personnel.
8. Supervisors, managers and/or Directors who receive the reports must promptly act to investigate and/or resolve the issue.
9. The whistle-blower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution.
10. If the investigation into a report, that was done in good faith and investigated by internal personnel, is not to the Whistle-blower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
11. The identity of the whistle-blower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the company are subject to subpoena.

Once the concern has been reported, it will be assessed, and consideration made of what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. The individual raising the concern will be told who will be handling the matter, how they can be contacted. At this stage, they will be asked whether they wish their identity to be disclosed and will be reassured about protection from possible victimisation. They will also be asked if they wish to make a written statement.

Managers / Directors must help to create a climate where staff feels able to talk in confidence without the threat of disciplinary action being taken against them.

If after investigation, any resultant action does not resolve the matter, or if a concern involves the immediate line manager, the member of staff should raise the concerns directly to the Managing Director, who will be the point of contact for employees under this policy.

If the concern raised is very serious or complex, a formal investigation may be held. The investigation may need to be carried out under the terms of strict confidentiality i.e. not informing the subject of the complaint until it becomes necessary to do so.

It is a requirement that the member of staff under investigation must be kept informed about the investigation and its outcome.

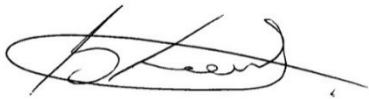
If the result of the investigation is that there is a case to be answered by any individual, the Company's Disciplinary Policy will be used and the details discovered by the formal investigation, transferred to that process.

Where there is no case to answer, but the employee held a genuine concern and was not acting maliciously, the company will ensure that the employee suffers no reprisals.

If there is no case to answer but there is evidence that the allegation was made frivolously, maliciously or for personal gain, disciplinary action will be taken against the complainant.

The matter will be dealt with promptly at each stage. Where appropriate, immediate steps will be taken to remedy the situation as soon as practicably possible. An outcome may take more time, but it is envisaged that final resolution / outcome at each stage should be available within ten working days.

Signed

A handwritten signature in black ink, appearing to read 'Bridget Ferrington', with a long horizontal stroke extending to the right.

Bridget Ferrington
Managing Director
4th January 2024