

Apprentify Group Limited

Whistleblowing Policy

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Scope

This policy applies to all employees of Apprentify Group Limited and its subsidiaries (the 'Organisation').

Definition

Whistleblowing is the name given to the act of disclosing information to the employer or the relevant authority by an individual who knows, or suspects, that the Organisation, or an individual within it, is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Qualifying Disclosures

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the Organisation has committed a "relevant failure" by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Organisation will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who make a qualifying disclosure. We encourage you to use the procedure outlined below to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Organisation's grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

Procedure

In the first instance you should report any concerns you may have to the HR Department. Concerns relating to or involving the HR department should be reported to the HR Director and concerns relating to the CEO should be reported to the Chair of the Board. All concerns reported will be treated in the utmost confidence.

You may submit your concerns in any format. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

While we encourage individuals to make qualifying disclosures to the relevant internal employee, we recognise that all individuals have the right to make qualifying disclosures to the relevant external organisation or regulatory body, should the individual feel that that is the most appropriate course of action. If an individual wishes to make a qualifying disclosure to an external organisation, they will need to follow that organisation's whistleblowing policy and procedure.

Following receipt of a disclosure made under this policy, an investigation meeting will be held. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence or can identify any witnesses.

This meeting will usually be held within two weeks following receipt of the disclosure. If circumstances mean that this timeframe is impractical, the person receiving the disclosure will ensure you are notified of the appropriate timescales.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

This investigation will usually be completed within four weeks following receipt of the disclosure. If this is not possible, the investigating manager will speak to you in advance of the completion deadline to agree an extended period of investigation.

Once the investigation is complete, the investigation manager will write to you confirming the outcome.

If you are not satisfied with the explanation or outcome, you may raise the matter with the HR Director, the CEO, the Chair of the Board, or the appropriate official organisation or regulatory body.

Formal Action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against detrimental treatment

Everyone who makes a qualifying disclosure is protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague because they have made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Review

This policy will be reviewed at least annually.