



Delivering managed procurement and business critical services

## Whistleblowing Policy

As a public limited company we must meet certain standards. One of those requirements is that we have in place a process for any member of staff, or a worker providing services to the company, to raise a genuine concern about serious malpractice within the company.

This is sometimes referred to as a Whistleblowing Policy. A summary of the policy is given below. The Employee Handbook contains additional details, or you can ask for a fuller explanation from the Human Resources team at Head Office.

### What is serious malpractice?

Examples are:

- Fraud or financial irregularity
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Endangering the health or safety of any individual
- Endangering the environment
- Any behaviour considered to be discriminatory against another individual.

### With whom do I raise a significant concern?

Normally, such matters should be raised with a director as soon as practicable. There are two exceptions where the matter can be raised at a higher level:

- i) If a Director is thought to be implicated in the malpractice, your concern should be raised with the Chief Executive.
- ii) If either the Chief Executive or the Finance Director is thought to be implicated, you should raise the matter with one of the Independent Non-executive Directors or Chairman (contact details are given at the end).

### What will happen?

Significant concerns should be disclosed in confidence to a Director of the company, (or as above), giving the grounds for the belief of malpractice, together with as much supporting evidence as possible. This should, wherever possible, be in writing but if this is not practicable, a verbal account should be given.

The Director will wish to interview you, in confidence, as soon as practicable. An investigation will take place. The Director will let you know whether or not further steps will be taken regarding the matter. If you wish to be accompanied to the interview, a colleague employed by the office2office group or a representative of a recognised trade union may accompany you.

As far as practicable, the name of the discloser will not be revealed in the investigation.

As it is in the public interest for such disclosures to be made, disciplinary action will not be taken against you as the discloser, provided the disclosure was made in good faith, as it is better for such matters to be raised rather than ignored. You will not be subjected to any form of detriment for raising a significant concern in this way.

However, if the disclosure was not made in good faith, for example, it was made maliciously or for personal motives, disciplinary action will be taken. Similarly, if the disclosure was made in breach of this procedure, disciplinary action will be taken.

### **What other steps can I take if I am not satisfied with the outcome?**

If you have followed this procedure in full but are not satisfied with any further steps decided upon, or the outcome of steps, you may raise the matter directly with a relevant external body such as the Police, a Member of Parliament, or the appropriate public authority.

Other circumstances in which External Disclosure may be permissible can be obtained from the Human Resources team.

Legal protection is given to individuals who decide in good faith to refer the matter to an outside body, provided the procedures above have been followed and the disclosure has been made in good faith.

### **How do I make contact with the Directors/Chairman?**

You can write or email the Directors, as below. All correspondence should be addressed to the relevant director at office2office plc, St Crispins, Duke Street, Norwich, Norfolk, NR3 1PD.

The Directors can be contacted via email either on the company email system or via the internet – using the address format shown below.

The Chief Executive, Chairman or Independent Non-executive Directors can be contacted by email as below:

Simon Moate, Chief Executive

simon.moate@office2office.biz

David Callear, Chairman

david.callear@office2office.biz

Chris Batterham, Independent Non-executive Director

chris.batterham@office2office.biz

Jim Cohen, Senior Independent Non-executive Director

jim.cohen@office2office.biz