Document Reference

External

Whistleblowing &

Grievance Policy

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External Whistleblowing & Grievance Policy

1. Purpose of this policy

At Thomas Franks we believe in transparency and accountability in our business practice to prevent any potential wrongdoing in our operations or extended supply chain.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage all stakeholders including employees, clients, suppliers, contractor, partners and the general public to follow this process if they feel they have grounds to do so. We are here to listen and will take all concerns that you raise seriously.

This policy sets out how stakeholders can raise a grievance or report misconduct via our website and the support and protection that is available throughout the process as well as the protection mechanisms for whistleblowers.

2. Scope of this policy

This policy applies to all stakeholders connected to our business or supply chain, including our employees, contractors, subcontractors, suppliers, volunteers and anyone in the general public who observes any potential wrongdoing linked to our business.

Concerns to which this policy relates and can be reported

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation and/or a miscarriage of justice;
- ethical misconduct including fraud, corruption or bribery;
- human rights violations or abuse;
- a risk to the health and safety of an individual;
- environmental damage, violations; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing in order to raise a concern / complaint or grievance. However, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest. Issues that are not related to the company's conduct or to internal HR matters not relevant to external third parties can be raised but may not be investigated via this process.

1. How to submit or report a grievance or whistleblowing concern

Stage 1 - Raising a whistleblowing concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it via the grievance form on our website Please address your concern directly to Vicky Freeman CPO or Lorraine Wright CFO.

It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged within 7 working days of us receiving your contact form.

Stage 2 - Responding to your concern

Once notified of the concern, our CPO / CFO will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant manager will write to you confirming that they are conducting an investigation and the timescale for completion (see below).

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing. The estimated timescales are detailed below. You will receive regular communication throughout the investigation process to keep you informed of progress and any changes in timescales based on the nature of the grievance being investigated. Following the investigation, the investigating manager will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

Grievance Timescales

1. Acknowledgement of grievance reported – within 7 working days to the email address on the grievance form (unless submitted anonymously)
2. Initiative review of grievance – within 14 working days – assessment of case and assignment to investigating manager.
3. Investigation of grievance – within 30-45 working days – independent investigation with written updates provided every 10 working days.

4. Resolution – timescale depending on the nature of the grievance being investigated – final investigation shared in writing and if the grievance is not accepted, a full explanation will be provided.

If we have a reason to believe that once investigated, the whistleblowing concern is not actually a grievance, we will respond to you in writing outlining the reasons why and the steps taken to investigate and come to this conclusion. Should you wish to query this outcome, you will be welcome to attend a meeting with the investigating manager to discuss this matter further.

Third party action

Should the grievance investigation find that a third party has acted in an unethical way, this may be dealt with through a termination of our contract / agreement or a report made to the appropriate regulatory authorities resulting in no future engagement with the responsible party.

Employee disciplinary process

Should the grievance relate to a Thomas Franks employee, our Disciplinary and Grievance policy will be followed and may result in disciplinary action or in serious cases, in a termination of employment if deemed necessary.

4. **Confidentiality and anonymity**

We want you to feel comfortable about raising a grievance or whistleblowing concern safely and confidentially and actively encourage you to do so. Where you raise a whistleblowing concern, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand. In the alternative, you may decide to raise a whistleblowing concern anonymously.

We encourage anonymous reporting over remaining silent. Although we will investigate any

concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate, and we will not be in a position to provide you with any feedback.

Our commitment to you – protection from retaliation

You have the right not to be subjected to any detrimental treatment because you have raised a whistleblowing concern. This can include but is not limited to:

• Harassment and intimidation

• Demotion or termination

• Contract cancellation

• Refusal of future work with the company

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection. All reporting being handled with the utmost confidentiality and information restricted to only those investigating managers involved in the grievance handling process outlined above.

If you are told not to raise or pursue a whistleblowing concern or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to Vicky Freeman CPO or Lorraine Wright CFO immediately via the grievance form. We will investigate any potential breach in confidentiality and ensure that this is dealt with appropriately according to our internal grievance and disciplinary processes as required.

Should this relate to a breach via Thomas Franks employees, this will be treated with the utmost seriousness. Any such behaviour will not be tolerated and will be investigated as a disciplinary offence. This will be dealt with via our Employee Disciplinary procedure and treated as potential serious misconduct subject to a final written warning or potential gross

misconduct.

Should this relate to a third party stakeholder, depending on the severity this may result in the termination of our contract / engagement.

5. Raising your whistleblowing concerns externally

We encourage you to raise your whistleblowing concerns via this process initially. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on GOV.UK).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

Further guidance

If you need further guidance or support, you can contact the whistleblowing charity Protect or Citizens Advice for free confidential advice.