

WHISTLEBLOWING POLICY

CENTURION SAFETY PRODUCTS LTD

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Purpose of this policy

The aim of this policy is to encourage personnel to raise any genuine concerns they might have about certain wrongdoings within the company without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

Who is covered?

Protection under the Public Interest Disclosure Act applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for us personally. It does not apply to genuinely self-employed contractors who run a profession or business on their own account.

Scope

This policy and supporting procedure is for making a disclosure of wrongdoing or malpractice where you reasonably believe that disclosure is in the public interest. If you are uncertain whether or not something is within the scope of this policy, you should seek advice from the CEO or a director.

You should not use this procedure as a way of raising personal issues relating to your specific job or employment and should refer instead to the grievance or dignity at work policies, as applicable.

Types of wrongdoing addressed by this policy

If you genuinely believe that we, or any of our workers, have taken, are intending to take or have failed to take action that you reasonably believe could lead or amount to:

- a criminal offence, including bribery
- a failure to comply with any legal obligations
- a miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment, or
- the deliberate concealment of information concerning any of the matters listed above

you should disclose this information verbally or in writing to the CEO or a director of the company. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

Investigating allegations of wrongdoing

If you disclose information in accordance with this policy, wherever reasonably practicable we will keep your identity confidential. We strongly discourage anonymous disclosures, as proper investigation may be more difficult or impossible if we cannot obtain further information from you.

We will investigate your allegation promptly and will take whatever action we consider appropriate. We may require your assistance during our investigation. Your allegation will be taken seriously, and we will aim to keep you informed of the progress of the investigation and its likely timescale.

If you are not happy with the way in which your concern has been handled, you can raise it with the CEO. In the case of your concern relating to the CEO, you can raise it with the Chairman via the Executive Assistant.

Internal versus external reporting

Any concerns covered by this policy should be raised with the company in the first instance to allow us the chance to deal with them. You should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed if you did not do so. Remember also that social media sites are public rather than private spaces and are not the appropriate channel for raising concerns.

We strongly encourage you to seek advice before reporting a concern to anyone external. Protect is an independent whistleblowing charity which operates a confidential helpline. Their contact details are: Helpline: (020) 3117 2520; Website: <https://protect-advice.org.uk/contact-protect-advice-line/>.

Remember also that social media sites such as Twitter and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

It will very rarely, if ever, be appropriate to alert the media.

Action we may take

No action will be taken against anyone who raises a genuine concern in accordance with this policy.

We may take appropriate action against any person found to be:

- victimising another person for making a disclosure, or deterring any person from reporting genuine concerns under this policy
- making a disclosure/allegation maliciously or in a vexatious way, or where there were no reasonable grounds for believing that the information supplied was accurate.

This may involve us taking disciplinary action, which could result in dismissal.

We may also take disciplinary action against a person who does not act in accordance with this policy.

Confidentiality, data protection and record keeping

We aim to deal with allegations raised under this policy sensitively and with due respect for the privacy of the individuals involved. All employees must treat as confidential any information communicated to them in connection with an allegation made under this Policy.

Conducting investigations and hearings under this policy involves us processing the personal data of the employees concerned. We use this personal data in order to investigate and deal with whistleblowing allegations. Our legal grounds for doing so are that it is necessary:

- to comply with our legal obligations and for the performance of the employment contract (i.e. to investigate and deal with allegations of wrongdoing in accordance with our duty of trust and confidence to our employees)
- in our legitimate interest to deal effectively with whistleblowing allegations, whether you are the subject of them or are otherwise connected to the issues raised

Special category data¹ and data relating to criminal offences or convictions may occasionally need to be processed under this policy – for example, where an employee raises an allegation of wrongdoing in the company which involves treating individuals badly because of their race or sexual orientation, or where an employee requires a reasonable adjustment to the operation of this policy to accommodate a disability. Our additional legal grounds for using such data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; and to establish, exercise or defend legal claims.

Where we take witness statements from employees with information about the allegations being investigated under this policy, such statements will be treated confidentially and will only be shared with individuals who need to be involved in the investigation and any follow-up action. This will ordinarily be Executive Assistant and the person/people conducting investigations. In addition, if in the course of investigations under this policy it becomes apparent that misconduct has taken place which requires investigation under our disciplinary policy, witness statements taken under this policy may be used in any subsequent disciplinary procedure and may therefore be shared with the person/people conducting investigations and hearings, as well as the employee whose conduct is the subject of disciplinary proceedings, to enable them to prepare for the hearing and respond to the allegations against them.

For information about our processing of personal data under this policy, including details of our legal grounds for doing so, how long we retain such personal data, who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, please see our Data Protection Policy, which can be accessed via our internal sharepoint system (COLIN), or a copy obtained from the Executive Assistant.

Status of this policy

This policy does not confer any contractual rights to employees, either express or implied.

Policy Owner

Executive Assistant

Review

December 2025

Version Control

Warning: Print copies not subjected to version control

¹ (i.e. personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sex life or sexual orientation, genetic data, or biometric data that is used to identify an individual)