

WHISTLEBLOWING POLICY

CENTURION SAFETY PRODUCTS LTD

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Purpose of this policy

The aim of this policy is to encourage you to raise any genuine concerns you 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 this policy applies to

This policy applies to all employees, officers, workers, contractors, apprentices, agency workers, volunteers and interns (together referred to as 'staff').

Scope

This policy is for making a disclosure of wrongdoing where you reasonably believe that the disclosure is in the public interest. You should not generally use this policy for complaints relating only to your own circumstances, such as the way you have been treated at work. In those cases, you should use the Policy – Grievance and Resolution or the Policy - Anti-bullying and Harassment, as appropriate. If you are uncertain whether or not something is within the scope of this Policy – Whistleblowing, you should seek advice from the Executive Assistant.

Types of wrongdoing addressed by this policy and how to raise concerns

If you genuinely believe that we, or any of our staff, 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;
- sexual harassment; 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.

Any concerns covered by this policy should be raised internally with the company to allow us the chance to deal with them. You should not bypass this 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.

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, too, that social media sites such as 'X', Bluesky, Instagram 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.

Dealing with allegations of wrongdoing

If you disclose information in accordance with this policy, wherever reasonably practicable we will keep your identity confidential, if that is what you would like. We discourage anonymous disclosures (although we will still make every effort to investigate such disclosures), as proper investigation may be more difficult or impossible if we cannot obtain further information from you.

We will arrange a meeting with you as soon as possible to discuss your concern (unless you make an anonymous disclosure) and will investigate your allegation promptly. We may require your assistance during our investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale. We will aim to inform you of the outcome of the investigation as soon as practicable, and whatever action (if any) we consider to be appropriate. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, the outcome and/or any disciplinary action taken as a result (see further below, concerning confidentiality).

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

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 Chair via the Executive Assistant.

Protection and support for whistleblowers

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

We may take appropriate action, including where appropriate disciplinary action up to and including dismissal, against any person found to be:

- subjecting a person to a detriment or dismissing them for using this policy; or
- deterring another person from reporting genuine concerns under this procedure, such as threatening or retaliating against them.

If you believe you have received such treatment for using this policy, please tell the Executive Assistant or raise it formally under the Policy – Grievance and Resolution or, if appropriate, the Policy – Anti-harassment and Bullying if the matter is not remedied.

We may also take disciplinary action where appropriate 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. You should 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 individuals concerned, which may on occasion include special category or criminal offence data. We use this personal data in order to investigate and deal with whistleblowing allegations. Depending on the context, our legal grounds for doing so could be that it is necessary:

- to comply with our legal obligations and for the performance of the employment contract (for example. to investigate and deal with allegations of wrongdoing in accordance with our duty of trust and confidence to our employees, or to investigate and deal with allegations of sexual harassment in accordance with our legal duty not to harass 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
- in our recognised legitimate interest to detect, investigate or prevent crime.

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. Depending on the context, our additional legal conditions for using such data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; to establish, exercise or defend legal claims; the employee has manifestly made the information public; or it is in the public interest to detect or prevent unlawful acts.

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 the 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 Policy - Disciplinary, witness statements taken under this policy may be used in any subsequent disciplinary matter 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.

We will ordinarily keep records of allegations raised under this procedure for 12 months from the date of completion of investigations and any follow-up action. However, there may also be circumstances in which it is appropriate for us to keep particular records under this policy for a longer period. In such circumstances, we will decide how long records should be retained in accordance with the criteria set out in our main employee privacy notice.

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 employee privacy notice, a copy of which can be accessed via our

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)

internal sharepoint system (COLIN), via our PeopleHR system or a copy obtained from the Executive Assistant.

Status of this policy

This policy does not give contractual rights to any individual. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Policy Owner

Executive Assistant

Review

April 2027

Version Control

Warning: Print copies not subjected to version control