




## Whistle Blowing Policy 2023

<b>Author:</b>	 SafetyForward Putting People First	<b>Date:</b>	28.09.23
<b>Review Date:</b>	30.04.24		
<b>Reviewed by:</b>	Safety Forward Ltd		
<b>Company Details:</b>	The Palfreymans Ltd T/A Urban Planters		
The Plant House, Stretton Road, Tansley, Matlock, Derbyshire, DE4 5GE		 URBAN planters® for a greener world	
Responsible Person: <b>Alan Page</b>			

## Whistle Blowing Policy

### POLICY STATEMENT

Urban Planters recognises the importance of having in place an effective and confidential channel of communication to allow employees to bring matters of concern, whether operational or personal, to the attention of senior management to enable Urban Planters to investigate fully and take appropriate corrective action.

The following procedures have been implemented to support Urban Planters' commitment to equal opportunities by providing a mechanism for the identification and investigation of alleged acts of discrimination, harassment and bullying in the workplace. They also comply with the Public Interest Disclosure Act 1998.

### DEFINITIONS

The channel of communication described in this policy is intended for use by employees for the disclosure of information which in the employee's reasonable belief tends to show one or more of the following:

- That a criminal offence has been committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That a person has failed, is failing or is likely to fail to represent to Urban Planters the true commercial risk of a project/venture.
- Any concealment or misrepresentation of Company information and/or abuse of Urban Planters policies and procedures.
- That the health or safety of any individual has been, is being or is likely to be compromised; or
- That information tending to show any matter falling within any of the preceding paragraphs has been or is likely to be deliberately concealed.

In addition to the above, the channel may be used to communicate information related to acts of discrimination, harassment or bullying in the workplace.

### PROCEDURE

1. If an employee wishes to raise a disclosure (whistle blowing) matter the following procedure must be followed:

- If an Employee wishes to seek independent advice on a potential disclosure matter before notifying one of the 2 designated persons listed below.

Urban Planters has a line of communication which employees may use for the purpose of notifying details of any acts/omissions listed in the foregoing definitions. This is the telephone number of a senior member of staff who is outside the department's direct management responsibility and has been trained and briefed to operate independently and confidentially in accordance with this policy, referred to throughout as the 'designated person'. The service is available during normal office hours.

Company Director: -

The designated person will require employees to identify themselves, but their identity will not be revealed to anyone else except the relevant person. The designated person will discuss the details of the allegation with the relevant person who will consider the matter and take the decision to progress (or not) the Complaint in accordance with the steps detailed below.

2. The Complaint will be fully investigated by the designated person. They will be responsible for ascertaining the facts, assembling the evidence to support them and determine if the matter should be referred further. To come to an informed decision, the designated person will conduct the investigation as follows:

- The designated person will conduct a preliminary interview with the whistle blower to ascertain the details of the complaint.
- The designated person will assemble all the available evidence including taking witness statements, where appropriate.

3. On completion of the investigation, the designated person will prepare a statement of what has emerged from the enquiries. The facts and documents will be assembled and analysed by the designated person who, in consultation with the relevant person will determine whether there are reasonable grounds to believe in the truth of the information disclosed. Serious allegations relating to Urban Planters' financial affairs will be referred to the audit committee of the board, who will oversee the investigation.

4. The results of the investigation will be notified by the designated person to the employee who raised the matter advising them of the course of action that will be taken. The designated person, in conjunction with the relevant person, will then take the course of action to prevent or remedy the issue. At this stage business unit management may need to be informed and use of Urban Planters Disciplinary Procedure may result.

5. The identity of the whistle blower and any witnesses interviewed WILL NOT be revealed to anyone else during the investigation phase other than the 'designated person' and the relevant person.

6. Employees who make use of the disclosure policy will not suffer any detriment because of having done so, whether after investigation the accusations are well founded or not. Moreover, any employee who victimises an employee who has correctly made use of this policy, will be subject to disciplinary action in accordance with Urban Planters Disciplinary Procedure. However, after investigation, should the designated person deem the employee's actions in making the complaint to be frivolous or vexatious, the matter will be subject to disciplinary action in accordance with Urban Planters Disciplinary Procedure and at that stage the employee's line manager will be informed.

7. Employees who fail to notify Urban Planters in the first instance of incidents of wrongdoing covered by this policy but instead notify an outside third party without giving Urban Planters the opportunity to deal with the matter internally, may lose the protection provided by the Public Interest Disclosure Act 1998.

### Policy sign off

Company Directors acceptance of responsibility for the policy and its implementation.

As Directors of Urban Planters, we accept responsibility for ensuring that Urban Planters is managed in a manner that will provide for compliance with Urban Planters' legal obligations and conformity with the objectives and requirements as detailed in this policy.

Name: (Print) Thomas Palfreyman (Managing Director)

Signature:



Date: 28<sup>th</sup> September 2023