





HR MANAGEMENT SYSTEM		
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Part 7 Section 04	WHISTLEBLOWING POLICY	
<div>1. About this policy</div> <div>1.1 Cammell Laird is committed to conducting business with honesty and integrity. Accordingly, we expect all employees, officers, consultants, contractors, interns, casual workers and agency workers to behave in a manner that aligns/complies with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly/unwittingly harbouring unlawful or unethical conduct in the workplace. In order to manage/mitigate this risk the company has engaged with a specialist third party whistleblowing organisation to provide a confidential hotline for all employees, officers, consultants, contractors, interns, casual workers and agency workers to use should they wish to report anything they feel may be unlawful or unethical in the workplace. The aim is to ensure all employees, officers, consultants, contractors, interns, casual workers and agency workers have a route to register a concern in a confidential manner without fear of reprisal.</div> <div>1.2 The aims of this policy are:<ul style="list-style-type: none">• To encourage employees, officers, consultants, contractors, interns, casual workers and agency workers to report suspected wrongdoing as soon as possible, in the knowledge that their identity will be protected and their concerns will be investigated by the Company at a senior level• To provide all employees, officers, consultants, contractors, interns, casual workers and agency workers with guidance as to how to raise those concerns.• To encourage a culture of openness and transparency in the workplace</div> <div>1.3 This policy covers all employees, officers, consultants, contractors, interns, casual workers and agency workers. This Policy does not cover past employees.</div> <div>1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.</div> <div>2. Personnel responsible for the policy</div> <div>2.1 The Chief Financial officer (CFO) has overall responsibility for this policy.</div> <div>2.2 The CFO and the Chief Technology officer (CTO) are the “Authorised Receivers of Information” from the Whistleblowing provider and responsible for investigating the concerns /suspected wrongdoings raised.</div> <div>2.3 All employees, officers, consultants, contractors, interns, casual workers and agency workers are responsible for adhering to this policy and should ensure that they use it to disclose any suspected wrongdoing.</div>		

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<p>3. What is whistleblowing?</p> <p>3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include, but not be limited to, the following subject matters:</p> <ul style="list-style-type: none">• Legal - failure to comply with any legal or regulatory requirements.• Bribery - the practise of offering something or taking something to gain an illicit advantage.• Corruption - is a form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire a personal benefit.• Theft - the unauthorised removal or taking of supplies, equipment, furniture, fixtures, products, cash, merchandise or other tangible property.• Environment, Health & Safety - conduct, actions, policies or practices that either violate environmental, health or safety laws or regulations or may cause or result in potentially hazardous conditions that impact the environment or the health or safety of employees, customers or others.• Facilitating tax evasion - conduct, actions, policies or practices that violate UK tax law /regulations.• Fraud – any intentional or deliberate act to deprive another of property or money by guile, deception or other unfair means.• Financial Mismanagement - Statements or actions that encourage or result in false or intentionally misleading entries into accounting, auditing or financial records.• Breach of internal policies and procedures including our Code of Conduct.• Discrimination – statements or actions based on age, race, colour, national origin, sexual orientation, gender, disability or religion that are the basis for employment, promotion or compensation decisions.• Conduct likely to damage the reputation or financial wellbeing of the company.• Harassment – persistent statements, conduct or actions that are uninvited, degrading, offensive, humiliating or intimidating and create an unpleasant or hostile environment.• Unauthorised disclosure of confidential information.• Bullying – the use of force, threat or coercion to abuse, intimidate or aggressively dominate others. The behaviour is often repeated and habitual.• Negligence – a failure to behave with the level of care that should be reasonably expected /exercised by an individual in that position. The behaviour usually consists of actions, but can also consist of omissions.		

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<ul style="list-style-type: none">Retaliation or Retribution – statements or actions discharging, demoting, suspending, threatening, harassing or discriminating against an employee because of any lawful act taken by such employee in connection with reporting a violation of law or policy, filing a complaint, or assisting with an investigation or proceeding.the deliberate concealment of any of the above matters.		
3.2	A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.	
3.3	This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure.	
3.4	If you are uncertain whether something is within the scope of this policy you should seek advice from the CFO in the first instance.	
4.	Raising a whistleblowing concern	
4.1	We hope that in many cases you will feel able to raise any concerns with your Line Manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the CFO.	
4.2	However, where you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should use the confidential whistleblowing service provided as set out in <u>Attachment 1</u> . You can contact the Service by phone, website or email as you prefer.	
5.	External disclosures	
5.1	The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.	
5.2	The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.	
5.3	Whistleblowing concerns generally relate to employees, officers, consultants, contractors, interns, casual workers and agency workers but they may sometimes relate	

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<p>to a customer or another third party. In this instance we encourage you to report such concerns initially via your line manager or the Whistleblowing hotline and not try to directly engage with the customer or the third party.</p>								
<p>6. Confidentiality</p> <p>All interaction with the Whistleblowing service (Attachment 1) provider is confidential. Unless by your express permission to the contrary your identity is not disclosed to Cammell Laird.</p>								
<p>7. Malicious Intent</p> <p>If the company concludes that a whistleblower has made false allegations maliciously/with intent to cause harm to the company or to other individuals the whistleblower will be subject to disciplinary action.</p>								
<p>8. Contacts</p> <table><tr><td>Chief Executive Officer (and the Designated officer assigned to intervene should there be concerns related to the Authorised Receivers of Information)</td><td>DAVID Mc GINLEY 0151 649 6860 d.mcginley@cammell-laird.co.uk</td></tr><tr><td>Chief Financial Officer (Policy Owner and Authorised Receiver of Information)</td><td>DARREN FISHER 0151 649 6604 d.fisher@cammell-laird.co.uk</td></tr><tr><td>Chief Technology Officer (Authorised Receiver of Information)</td><td>LINTON ROBERTS 0151 649 6605 l.roberts@cammell-laird.co.uk</td></tr></table>			Chief Executive Officer (and the Designated officer assigned to intervene should there be concerns related to the Authorised Receivers of Information)	DAVID Mc GINLEY 0151 649 6860 d.mcginley@cammell-laird.co.uk	Chief Financial Officer (Policy Owner and Authorised Receiver of Information)	DARREN FISHER 0151 649 6604 d.fisher@cammell-laird.co.uk	Chief Technology Officer (Authorised Receiver of Information)	LINTON ROBERTS 0151 649 6605 l.roberts@cammell-laird.co.uk
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ATTACHMENT 1 - The Confidential Service



Welcome

Cammell Laird is committed to upholding the highest standards of conduct and ethics. In line with this commitment SeeHearSpeakUp has been appointed to provide an external and independent confidential reporting service to you. If you have serious concerns about any aspect of Cammell Laird's work you are encouraged to come forward and voice those concerns in a safe and secure manner. You have the right to raise concerns in the knowledge that they will be taken seriously and investigated appropriately.

Concerns that you raise will be passed to senior officers within Cammell Laird to consider potential investigation. Your personal details, such as your name and contact information will not be shared unless you provide SeeHearSpeakUp with your consent to share your details. Although not encouraged, you can also raise concerns anonymously to SeeHearSpeakUp.

How it works

Cammell Laird encourages you to raise concerns internally. However, if for whatever reason, you wish to raise concerns to SeeHearSpeakUp you can do so using the following reporting channels:

PHONE



ONLINE



EMAIL



You can call SeeHearSpeakUp call handlers on 0800 056 2539. The confidential reporting hotline is operated 365 days a year, 24 hours a day. All call handlers are professionally trained and qualified to ensure that you are dealt with in a professional and confidential manner.

You can report online via the website at www.seehearspeakup.co.uk/en/file-a-report. You will need your username and password to login. The details are as follows:

USERNAME - Cammell


PASSWORD - Claird572


Alternatively you can email your concerns to SeeHearSpeakUp at report@seehearspeakup.co.uk. When emailing please state the organisation you work for in the subject header.

TYPES OF WRONGDOING YOU CAN REPORT

- | | |
|------------------------------|---------------------|
| ⊕ Financial Mismanagement | ⊕ Environmental |
| ⊕ Bribery | ⊕ Health and Safety |
| ⊕ Discrimination | ⊕ Bullying |
| ⊕ Retaliation or Retribution | ⊕ Theft |
| ⊕ Fraud | ⊕ Corruption |
| ⊕ Legal | |

This information is published without the responsibility on our part for loss occasioned to any person acting or refraining from action as a result of any information published herein.

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<ul style="list-style-type: none">• SeeHearSpeakUp is a unique external confidential reporting service that operates 24 hours a day, 365 days a year enabling employees, officers, consultants, contractors, interns, casual workers and agency workers to report matters without fear.• SeeHearSpeakUp call handlers are professionally trained. They have a broad and extensive investigative background and they will ensure that concerns are dealt with professionally and in a sensitive, empathetic manner. They are independent from Cammell Laird.• SeeHearSpeakUp's language solutions provider is powered by the largest, most accomplished, experienced and professional linguist team in the world. As such SeeHearSpeakUp have instant access to over 200 different languages.		
<h3>How it Works</h3> <ul style="list-style-type: none">• You can report concerns 24 hours a day, 365 days a year by phone, web report or via email• Once you have made your telephone call to SeeHearSpeakUp, you are immediately connected to a qualified staff member, who will put you at ease and explain the process to you.• You will be reminded that the call is not being recorded and that everything you advise will be treated in the strictest confidence.• SeeHearSpeakUp will encourage you to divulge all of the relevant information you wish to report, and their qualified staff will use their interviewing skills to assist you.• You will be asked questions but the discussion will be conducted in an informal relaxed manner. The details of your information will be read back to you to check for accuracy.• SeeHearSpeakUp encourage you to provide your contact details which are held in the strictest confidence and not passed to Cammell Laird. SeeHearSpeakUp like to obtain contact details in order for them to provide the person registering you with feedback about the action taken by Cammell Laird.• SeeHearSpeakUp understand that you may still wish to remain anonymous and this is your decision. They will advise you of any existing country specific legislation relating to your right to anonymity.• SeeHearSpeakUp will provide a detailed report of your information to the nominated Authorised Receivers of Information in Cammell Laird (the MD and CFO) to decide what course of action that should be taken.• Where you have provided your contact details, SeeHearSpeakUp will provide feedback to you in accordance with Cammell Lairds instructions.• If you choose to remain anonymous, SeeHearSpeakUp will issue you with a Personal Identification Number (PIN) should you wish to call back seeking an update regarding your concern or to provide any further information in support of your concern. This enables SeeHearSpeakUp to identify your original report and provide you with a status update or to update the report with any further information you may wish to add.		

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SeeHearSpeakUp Whistleblowing Process

For “Employee” read employees, officers, consultants, contractors, interns, casual workers and agency workers

