

Whistleblowing Policy

Introduction

Whistleblowing is raising a genuine concern about suspected wrong-doing within an organisation. A Whistleblower is a person who raises a genuine concern about wrongdoing in the workplace. The Company is committed to the highest standards of openness, probity, and accountability. We therefore view it as extremely important to have a mechanism in place to enable staff to voice concerns in a responsible and effective manner.

Scope

This policy has been designed to enable employees of The Company to raise concerns internally, and to disclose information which they believe shows malpractice or impropriety without fear. The policy is intended to cover concerns which are in the public interest. Wrongdoing may include, but is not limited to:

- Financial fraud or mismanagement
- Failure to comply with legal, professional or regulatory obligations and requirements
- Criminal activity
- Danger to health and safety or the environment
- Improper conduct or unethical behaviour
- Attempts to conceal any of the above

The policy is not designed to question financial or business decisions taken by The Company. Neither should the policy be used for complaints relating to the employee's own personal circumstances, such as the way the employee has been treated at work. The Grievance Procedure or Equal Opportunities and Dignity at Work Policy should be used in these cases.

Protection and Confidentiality

Employees who whistleblow are protected by the Public Interest Disclosure Act 1998* provided the disclosure is made with reasonable belief of malpractice or impropriety. The Company takes this extremely seriously, no employee who raises a whistleblowing concern will suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If employees feel they have suffered any such treatment, they should raise it formally through the Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action. The Company will make every effort to treat all disclosures in a confidential and sensitive manner. However, The Company does not encourage staff to make disclosures anonymously. Proper investigating may be more difficult or impossible if we

The Chiltern Lift Company Limited, 8 Furlong Road, Bourne End. Buckinghamshire, SL8 5DG

T: 01628 529 247 F: 01628 810821 E: enquiries@chilternlifts.co.uk

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cannot obtain further information from the employee. It is also more difficult to establish whether any allegations are credible and have been made in good faith

If an employee is in any doubt they can seek advice from Protect (previously known as the Public Concern at Work), the independent whistleblowing charity, who offer a confidential helpline.

Their contact details are:

Helpline: 020 7404 6609

Email: whistle@protect-advice.org.uk Website:

www.pcaw.org.uk/

*The Public Interest Disclosure (Northern Ireland) Order 1998, as appropriate in Northern Ireland.

Raising a Whistleblowing Concern

The Company hopes that in many cases the employee will be able to raise any concerns with the employee's line manager. However, if the employee would prefer not to raise it with them for any reason they should contact a Senior Manager. The employee may make the disclosure in person or put the matter in writing if they prefer.

All complaints will be fully investigated by an appropriate Senior Manager with relevant experience of investigations who is not connected with the case. The whistleblower may be asked to attend a meeting to discuss the concern. The employee may be accompanied by a colleague or trade union official, the companion must respect the confidentiality of the employee's disclosure and any subsequent investigation.

The Company will endeavour to keep the employee updated on the progress of the matter and the outcome of the investigation. The employee should appreciate that it may not always be possible or appropriate to tell them detail of any action, but they will be informed if action is taken. If it is found that a whistleblower has made false allegations maliciously, or with a view to personal gain, the whistleblower will be subject to disciplinary action.

If the employee is not happy with the way in which their concern has been handled, the employee can raise it with another manager or the Chairman of the Board of Directors.

Raising Concerns Externally

An employee should always, in the first instance, raise any concerns internally. It is The Company's intention that employees will not find it necessary to alert anyone externally.

However The Company accepts that in certain circumstance it may be necessary to raise a concern externally, for example if the employee is not satisfied with an internal response to a disclosure. In such cases, employees are entitled to contact a "relevant body" to express concerns, in doing so the individual should:

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- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body
- have a reasonable belief it is in the public interest to make the disclosure

A “relevant body” is likely to be a regulatory body (eg the Health and Safety Executive, or the Financial Services Authority). The media is not a relevant external body. Employees should not contact the media with allegations about the organisation.

We strongly encourage employees to seek advice before reporting a concern externally. Employees are encouraged to contact the Public Concern at Work confidential helpline.

Signature of Director



Mr. S. Festorazzi – Director

Date: 03/01/2025

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