

COMPTOIR GROUP

WHISTLEBLOWING (PUBLIC INTEREST DISCLOSURE) POLICY

Purpose of this Policy

The Company constantly strives to safeguard and act in the interest of the public and its employees. It is important to the Company that any fraud, misconduct, or wrongdoing, by employees or other agents, is reported and properly addressed. This policy details the responsibilities we all have in recognising and reporting any such concerns, and the procedure we want everyone to follow.

Policy statement

The Company is committed to safeguarding and acting in the interest of the public and its employees, and it encourages all its employees to raise any concerns they may have regarding fraud, misconduct, or wrongdoing, by our employees or other agents. This policy applies to all employees of the Company, who are encouraged to report concerns in a responsible manner so they can be properly addressed.

Your responsibilities

You are encouraged to make the Company aware of any practice or action by the Company or its employees, that you reasonably believe is against the public interest, because the practice or action is a criminal offence, a failure to comply with any legal obligation, a miscarriage of justice, a danger to the health and safety of any individual or an attempt to conceal information on any of the aforementioned.

Any individual raising legitimate concerns will not be subject to any detriment, either during or after employment. The Company will also endeavour to ensure that the individual is protected from any intimidation or harassment by any other parties. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, which should be raised under our Grievance Procedure.

Procedure

In the first instance, you should raise any concerns you have with your manager. If you believe your manager to be involved, or if, for any reason, you do not wish to approach your line manager, then you should raise it with a director. Any matter raised under this policy will be investigated promptly and confidentially. The outcome of the investigation, as well as any necessary remedial action to be taken, will be confirmed to you. If no action is to be taken, the reason for this will be explained to you.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If you raise any concerns under this policy, Company is committed to ensuring you are protected from victimisation, harassment, or any less favourable treatment. Any such incidents will be dealt with under our Disciplinary Procedure.

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Escalating your concern

You should raise your concerns in writing directly with HR if you are dissatisfied with the response.

If, after escalating your concerns, you believe that the appropriate remedial action has not been taken, you should report the matter to the proper authority. Such authorities may include HM Revenue & Customs, the Financial Conduct Authority, the Health and Safety Executive, the Environment Agency, or the Information Commissioner. This list is not intended to be exhaustive, and you must take care to ensure you contact the proper authority in relation to the concerns you have. If you are unsure as to the appropriate authority, advice can be sought from Public Concern at Work which is an independent Whistleblowing Charity. Their contact details are below.

If you raise a false allegation and you are found to be culpable, or in any way involved in the wrongdoing, or if you raise a concern maliciously or in a manner not prescribed in this policy, then you may be subject to disciplinary action up to and including dismissal without notice for gross misconduct.

You should not disclose to a non-relevant third party any details of any concern raised in accordance with this policy, and you must not, in any circumstances, publicise your concerns in any way.

Independent advice

Independent advice and support can be obtained from Public Concern at Work (Independent Whistleblowing Charity): whistle@pcaw.co.uk or www.pcaw.co.uk or 0207 404 6609. If you have any questions about this policy, procedure, or “whistleblowing” in general please speak with your manager in the first instance.