WHISTLEBLOWING POLICY

Introduction

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

Qualifying Disclosures

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a "relevant failure" by:

- Committing a criminal offence;
- Failing to comply with a legal obligation;
- A miscarriage of justice;
- Endangering the health and safety of an individual;
- Environmental damage; or
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be "in the public interest". We encourage you to use the procedure to raise any such concerns.

The Procedure

In the first instance you should report any concerns you may have to a Director who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

Alternatively, in the first instance you can report any concerns you may have to the Health Assured external whistleblowing service by calling the 24 hour confidential helpline. A trained Health Assured advisor will then pass on the details of your concerns to a Company Director. You can request updates on the process or remain anonymous. If you are not satisfied with the

explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

If you do not report your concerns to a Director or the Health Assured whistleblowing service you should take them direct to the appropriate organisation or body.

Treatment by Others

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.