WHISTLEBLOWING POLICY

The Tibbetts Group encompassing the divisions of TGL, BFC and PG source, test, supply, repackage and assemble batch traced engineered components to Automotive, Aerospace and Industrial sectors and are dedicated to product quality and customer satisfaction.

Policy Statement

Tibbetts is committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards in accordance with our Employee Handbook. However, all organisations face the risk of things going wrong from time-to-time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

Definition

The purpose of this policy is:

- To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
- To provide employees with guidance as to how to raise those concerns
- To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

This policy does not form part of any contract of employment, or other contract to provide services, and we may amend it at any time.

Scope

This policy applies to all employees (full-time, part-time and fixed term), consultants, contractors, volunteers, interns, casual workers and agency workers.

Responsibilities

The Group People & Culture Manager has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Group People & Culture Manager also has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries relating to it, and ensuring that regular and appropriate training is provided to all Managers and employees who may deal with concerns or investigations under this policy.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved, and these should be addressed to the People & Culture Department.

Definition: Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, dangers at work or a report of sexual harassment. This may include:

- criminal activity;
- breach of the Anti-slavery, Human Trafficking and Child Labour Policy (PC31);

- failure to comply with any legal or professional obligation or regulatory requirements; miscarriages of justice;
- danger to health and safety; damage to the environment;
- bribery under our Anti-corruption and Bribery Policy;
- facilitating tax evasion contrary to our Anti-facilitation of Tax Evasion Policy; financial fraud or mismanagement;
- breach of our internal policies and procedures including our Code of Conduct; conduct likely to damage our reputation, financial wellbeing, or bring Tibbetts in to disrepute;
- unauthorised disclosure of confidential information; negligence; and
- the deliberate concealment of any of the above matters.

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, danger affecting any of our activities (a whistleblowing concern) or a report of sexual harassment, you should report it under this policy.

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 in the Employee Handbook or the Harassment and Bullying Policy (PC08) as appropriate.

If a complaint relates to your own personal circumstances, but you also have wider concerns regarding one of the areas outlined out in the examples above (e.g., a breach of our internal policies), you should discuss with the Group People & Culture Manager which route is the most appropriate.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Group People & Culture Manager whose contact details are at the end of this policy.

Raising a concern

We hope that in many cases you will be able to raise any concerns with your line manager in the first instance. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively.

Where the matter is more serious however, 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 contact one of the following:
Group People & Culture Manager
Group People & Culture Advisor
Department Leadership Director

Appropriate contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague, or union representative, to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will make a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone who is investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. You should be aware that a thorough investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Any Whistleblower who is concerned about possible reprisals if their identity is revealed, should come forward to the Group People & Culture Manager or the Group People & Culture Advisor and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from our free confidential Employee Assistance Programme helpline or 'Protect', the independent whistleblowing charity, who offer a confidential helpline. All contact details are at the end of this policy.

Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will then inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

In some cases, we may appoint an investigator, or team of investigators, including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not happy with the outcome of the investigation you can make an appeal against the decision giving the reason why to the People & Culture department. If there is good reason to do so, the disclosure will be re-investigated. Once the company's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant employees. If no action is to be taken, the reasons for this will be explained to you.

If, upon conclusion, you believe that appropriate action has not been taken, you may then report the matter to the proper authority e.g. Police, Environment Agency, Health & Safety Executive etc.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled and/or can make suggestions for improvement, you can raise it with the People & Culture Department, the details of which are at the end of this policy.

External disclosures

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.

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 externally. The independent whistleblowing charity, 'Protect', operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, client, supplier, or service provider. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first, in line with this policy. You should contact your Line Manager or one of the other individuals set out in the paragraph 'Your responsibilities and how to raise a concern'.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group People & Culture Manager or your Line Manager immediately. If the matter is not resolved, you should raise it formally using our Grievance procedure, found in the Employee Handbook.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

Contact details

Tibbetts People & Culture Department
Group People & Culture Manager and Group People & Culture Advisor
Email: people@tibbettsgroup.com
Tel: 01295 477502

Health Shield (Employee Assistance Programme)
Free Helpline: 0800 028 1963

Protect (Independent UK Whistleblowing charity)
Free Helpline: 0203 117 2520
Email: info@protect-advice.org.uk
Website: https://protect-advice.org.uk/contact-protect-advice-line/

Monitoring and review

The People & Culture Manager will monitor its effectiveness and review this policy on a regular basis in consultation with the Management Team to ensure that it continues to support business objectives.