

Whistleblowing Policy

Foreword

Our vision is to be the leading customer service focused provider of specialist utility and infrastructure solutions operating on both public and private networks. In order to achieve this we expect the highest standards of conduct and business integrity from every employee and worker and business partners who supply services to Ipsum including agents and intermediaries and sub-contractors and consultants.

We expect our employees and workers to speak up and report any suspected wrongdoing or breaches of the law or internal policy. I am committed to creating a culture of openness and accountability in Ipsum. Disclosing any form of suspected wrongdoing or unacceptable behaviour is always the right thing to do.

I realise it may be hard to raise concerns. When you raise genuine concerns or report suspected wrongdoing, you are doing the right thing and Ipsum will not tolerate any form of retaliation against you. You can also be assured that where there is reason to believe that misconduct may have occurred, we will conduct an appropriate investigation and, if it has occurred, address it appropriately.

Richard Thomas

CEO

Introduction

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or danger at work and a whistle-blower is a person who raises a genuine concern relating to this.

This whistleblowing policy applies to all employees of Ipsum, whether temporary or permanent, and casual and agency workers. It also applies to business partners who supply services to Ipsum including agents and intermediaries, sub-contractors and consultants. We will do business only with those who accept the terms of our policy or whose own policy sets standards that match our own.

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 or Anti-harassment and Bullying Policy as appropriate.

What is whistleblowing?

The following are examples of potential wrongdoing or dangers at work, the disclosure relating to which would be considered whistleblowing or “blowing the whistle”:

* bribery, fraud or other criminal activity
* miscarriages of justice
* danger to health and safety
* damage to the environment
* failure to comply with any legal obligation or regulatory requirements
* financial fraud or mismanagement
* negligence
* conduct likely to damage our reputation
* unauthorised disclosure of confidential information
* the deliberate concealment of any of the above matters

This list is not exhaustive; if you are uncertain whether something is within the scope of this policy you should contact the Ipsum Head of Human Resources.

Aims of the policy

* To provide guidance on raising a concern
* To encourage the reporting of a concern as soon as possible and provide assurance that genuine concerns will be taken seriously and appropriately investigated
* To reassure that there should be no fear of reprisal for raising genuine concerns, even in the event they turn out to be mistaken
* To provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, including the clarification of roles and responsibilities

Why you should report your concern

You have a duty to raise any concerns. In doing so, you help to protect yourself, your colleagues, and the business by enabling these to be addressed quickly and properly. Timeliness in reporting is essential so issues can be addressed as efficiently and effectively as possible.

We understand raising concerns can be difficult. Generally, people do not raise concerns because they may fear retaliation. When you raise concerns or report suspected wrongdoing, you are doing the right thing and Ipsum will not tolerate any retaliation against you. If you believe someone has retaliated against you or any other colleague for raising a concern, contact the Head of Human Resources as soon as possible. Anyone who retaliates against a person for raising a concern will face action in accordance with Ipsum’s disciplinary procedure.

You will never be disciplined for raising a genuine concern. The Employment Rights Act 1996 (ERA), as amended by the Public Interest Disclosure Act 1998 (PIDA) provides protection to those who raise genuine concerns protection against dismissal or other forms of detriment. However, if you are found to have made allegations maliciously and/ or not in good faith, action in accordance with Ipsum’s disciplinary procedure may be instituted against you.

Any time anyone raises a concern about a potential issue, we will take appropriate action to investigate and respond. We will take any necessary corrective action, including disciplinary action when appropriate, regardless of the seniority of those persons involved.

How to raise a concern

You may raise a concern verbally, by letter or email. If you raise a concern verbally, you will usually be asked to confirm this in writing. Please raise any concern under this policy to the Head of Human Resources.

Should you ask that your identity be kept confidential, all reasonable efforts will be made by us to do so.

We prefer that disclosures are not made anonymously. Proper 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. We hope that you will feel able to voice concerns openly under this policy.

Investigation process

Once you have reported a concern, the Head of Human Resources will appoint an appropriate investigating officer whose responsibility it will be to conduct the investigation. The investigating officer will be independent of the allegations raised and anyone implicated.

The investigating officer may contact you to seek further details from you to assist the investigation. Where possible you will be given periodic updates and informed when the investigation is complete.

If you are not satisfied with the way your concern has been handled, please raise this with the Chief Executive Officer.

External disclosures

Most cases should not need to be raised outside Ipsum.

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. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. They can be contacted on 020 7404 6609.

Whistleblowing concerns usually relate to the conduct of our colleagues, but they may sometimes relate to the actions of a third party, such as a supplier or subcontractor. 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 following the process set out in this policy.