	POL-IPS-004	Rev: 2.0	Review Date: 30/08/2025
	Whistleblowing (Disclosure) Policy		
Author or latest reviewer name	Mary H	Date: 14/04/2023	
Authoriser name	QSIM	Date: 27/04/2023	

## Whistleblowing (Disclosure) Policy

### What is Whistleblowing?

Whistleblowing encourages and enables employees to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

Employees are often the first to realise that there is something seriously wrong. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the Company.

### Our Commitment

IPS International (IPS) is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the Company's work to come forward and voice those concerns.

### Who does the Policy apply to?

The policy applies to all employees, associates and sub-contractors

### The Aims of the Policy

To encourage you to feel confident in raising concerns and to question and act upon concerns about practice.

To provide avenues for you to raise concerns in confidence and receive feedback on any action taken.

To ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.

To reassure you that you will be protected from possible reprisals, subsequent discrimination, disadvantage or victimisation if you have a reasonable belief that you have made a disclosure in good faith.

### What Types of Concern are Covered?

Conduct which is an offence or a breach of law.

Failure to comply with a legal obligation.

Disclosures related to miscarriages of justice.

Health and safety risks, including risks to the public as well as other employees.

Damage to the environment.

The unauthorised use of company funds.


Possible fraud and corruption.

Sexual, physical or other abuse of clients.

Other unethical conduct.

Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.

NB. Other procedures are available to employees e.g. the Grievance procedure which relates to complaints about your own employment. This policy also does not replace other corporate complaints procedures which are for customer use.

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### Implications of raising a concern

IPS is committed to good practice and high standards and want to be supportive of all staff. If you reasonably believe that your concern relates to any of the areas set out in the previous paragraph and you disclose the information to the appropriate person in good faith, no action will be taken against you for making the disclosure.

If you are found to be victimising a colleague for using this policy or you deter a colleague from using this policy to raise genuine concerns, you may be subject to formal action via the Staff Disciplinary policy.

If a disclosure or allegation is found to be malicious or vexatious and has been made for personal gain or there were no reasonable grounds for believing that the information was accurate, the Staff Disciplinary policy will apply.

### Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

This policy encourages you however to put your name to your concern whenever possible.

Please note that:

Staff must disclose the information in good faith.

Staff must believe it to be substantially true.

Staff must **not** act maliciously or make false allegations.

Staff must **not** seek any personal gain.

### How to Raise a Concern

As a first step, you should normally raise concerns with your immediate supervisor/manager or their superior. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach a more senior level of management within the company.

### IPS Response to Concerns

IPS will respond to your concerns within 5 working days of you raising your concern with us. In order to protect you and those accused under this policy, initial enquiries will be made to decide whether an investigation is appropriate and if so, how it should progress. The overriding principles, which we will have in mind, are our customers, our employees and the public's interest.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.


Within a reasonable period of a concern being raised, and if possible, within 14 days, the responsible person will write to you to:

Acknowledge receipt of your concern;

Indicate how we will deal with the matter;

Give an estimate of how long it will take to provide a final response;

Advise whether any initial enquiries have been made;

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Advise where you may obtain support;

Advise whether further investigation will take place and if not, why not.

The amount of contact between managers considering the issue and you will depend on the nature of the matter raised and the clarity of the information provided.

We will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence as a witness in criminal or disciplinary proceedings, we will arrange for you to receive advice concerning the process.

We accept that you need to be reassured that we have addressed matters and subject to legal constraints, we will inform you of the outcome.

### **Taking Further Action**

This policy is intended to provide you with an avenue to raise your concerns and have them addressed. If you are not satisfied with the outcome and consider it appropriate to take the matter outside the company, the following are possible contact points for you to consider:

Public Concern at Work;

Citizens Advice Bureau;

Relevant professional bodies / regulated organisations;

Police.

Remember that you have a duty of confidentiality to us. If you do take the matter outside of the company, care should be taken to ensure that there are no disclosures of confidential and / or commercially sensitive or unrelated confidential information without the proper authorisation.

If you are not able to check this with us, you must check with the person with whom you make the external contact in order to protect them.