

1. Introduction

- 1.1 Perilya Limited ("**the Company**") is committed to developing a culture where all staff are encouraged to raise concerns about poor or unacceptable practice and misconduct, and can do so safely.
- 1.2 The purpose of this policy is to promote responsible whistleblowing about issues where the interests of others, including the public, or of the Company itself, are at risk. Such issues might include:
 - a criminal offence
 - the breach of a legal obligation
 - a miscarriage of justice
 - financial impropriety
 - a danger to the health or safety of any individual
 - damage to the environment
 - deliberate covering up of information tending to show circumstances of this kind.
- 1.3 The exception is where the issue relates to a member of staff's personal position, when it would be more appropriate to use the agreed grievance procedure.
- 1.4 A member of staff raising a concern will not be expected to produce unquestionable evidence to support the case - this is the responsibility of the Company once it has been alerted to a potential problem. All that is required is that the member of staff has a genuine doubt and that the concern is raised in good faith. It is in the Company interests to hear of suspicions at the earliest possible opportunity.

2. Safety and Confidentiality

- 2.1 A whistleblower will not be regarded as a sneak or troublemaker. The Company recognises that a whistleblower usually only decides to express a concern after a great deal of thought. Provided the concern is raised in good faith, the member of staff will not be at risk of losing their job or suffering any form of reprisal for coming forward. It does not matter whether the suspicion proves to be unfounded or real. The Company will not tolerate the harassment or victimisation of anyone who raises a genuine concern and will deal with any such occurrences under the disciplinary and/or harassment procedure.
- 2.2 If a member of staff maliciously raises a matter which they know to be untrue, this will be regarded as misconduct and will be dealt with through the disciplinary procedure.
- 2.3 The Company recognises that the whistleblower may not wish to be identified during the course of an investigation. In such circumstances, the Company will do everything possible to protect the member of staff's identity and will not disclose it without their consent. If it proves impossible to resolve the matter without revealing the whistleblower's identity, the investigating officer will discuss with them whether and how to proceed. In a very few cases, it may not be possible to ensure complete confidentiality, for example

if legal proceedings take place at a later stage, but the Company will do everything possible to support and protect the member of staff.

- 2.4 Reports submitted anonymously will be considered but it will be much more difficult for the investigating officer to look into the matter and resolve the problem. Staff are therefore encouraged to put their name to reports and assist the investigating officer as much as they can.

3. Procedure for Reporting Concerns

- 3.1 Any member of staff who wishes to raise concerns under this policy should first speak to their immediate manager or put the concern in writing to this person. If it is not appropriate - for any reason - to report to their immediate manager, the member of staff may speak directly to a designated senior manager. If the member of staff does not wish to be identified, they should say this at the first possible opportunity so that appropriate arrangements can be made.
- 3.2 The manager will note the key points of the concern and check that the member of staff has a copy of this whistleblowing policy. The manager will also assure the member of staff of confidentiality.
- 3.3 The manager will then refer the concern to a designated senior manager who has responsibility for concerns raised under this policy, and hand over any written materials.
- 3.4 The senior manager will decide what action to take. This may include initiating an internal investigation or a more formal inquiry, or taking alternative appropriate action. The senior manager will inform the member of staff who raised the concern about the action to be taken. The member of staff can request that this is done in writing.
- 3.5 The senior manager may ask the member of staff how they think the matter might best be resolved. If the member of staff has any personal interest in the matter, it is essential that this is made known to the senior manager at the outset. If the senior manager thinks the matter should be pursued through the grievance procedure instead of through this policy, they will advise the member of staff accordingly.
- 3.6 If an investigation is undertaken, the senior manager will keep the member of staff informed about what is happening, as far as possible. Again, if requested, these reports will be made in writing. In some cases, it may not be possible to report to the member of staff the precise action taken as doing so might, for example, infringe on someone else's confidentiality.

4. External Contacts

- 4.1 There may be occasions when it is more appropriate for the member of staff to raise the concern with someone outside the organisation, including the police. If the member of staff believes this is preferable, they should seek advice from a trade union or other representative.