

## **Whistleblowing Policy**

### **1. Introduction**

The Company (Omnia Projects Limited) is committed to the highest standards of ethical conduct and integrity in its business activities. This whistleblowing policy outlines the procedures you should follow for dealing with allegations of illegal and improper conduct. It sets out what you should do if you have reason to believe that something dangerous, unlawful or unethical is going on at work and it is affecting (or risks affecting) you or others.

Omnia Projects want all employees to be confident and comfortable and we will always take your concerns seriously and they will be thoroughly investigated by the appropriate personnel. There will be no reprisals for individuals who bring these concerns to our attention. We all play an important role in ensuring that our business and everyone working in and with it acts professionally, lawfully and appropriately.

### **2. Scope of the Policy**

This procedure does not replace other policies and procedures such as the Disciplinary & Grievance Policy, and other specifically laid down statutory reporting procedures. This procedure is intended to ensure that the Omnia Projects complies with its duty under the Public Interest Disclosure Act 1998.

This policy applies to all employees and officers of the Company, and temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ("associated persons").

### **3. What is Whistleblowing?**

Whistleblowing is the term used when a worker passes on information concerning wrongdoing. To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually covered by whistleblowing law.

The second thing is that a worker must reasonable believe is that the disclosure tends to show past, present or likely future wrongdoing into one or more of the following categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering of someone's health and safety
- damage to the environment

- covering up wrongdoing in the above categories

Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have 'blown the whistle'.

#### **4. Confidentiality**

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. You are always encouraged to raise concerns openly. This is because it is not always easy to manage and to investigate anonymous reports, especially since if we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. However, if you prefer to keep your identity anonymous, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible.

#### **5. Reporting suspected Whistleblowing**

If you are aware or suspicious of any wrongdoing you should report it to one of our Directors.

- a) Steve Crowe, Director  
[stevecrowe@omniaprojects.co.uk](mailto:stevecrowe@omniaprojects.co.uk)      07725 818591
- b) Robert Martin, Director  
[robertmartin@omniaprojects.co.uk](mailto:robertmartin@omniaprojects.co.uk)      07725 818589

You may do so in writing (or in-person) setting out all the key facts, including names of those involved and all relevant dates. State that you are using the whistleblowing process specifying whether you wish to keep your identity confidential. You will be invited to a meeting at which you can discuss your concerns.

If you are not satisfied with how we have dealt with your concern, or do not wish to deal directly, you can contact the Advisory, Council and Arbitration Service (ACAS) or the whistleblowing charity Protect.

#### **6. Investigation**

We will investigate any reports of suspicious wrongdoing fully, fairly, quickly and confidentially where circumstances permit.

The length and scope of any investigation will depend on the subject matter, in most instances, there will be an initial assessment to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is; for example, based on incorrect information. You may be required to attend additional meetings in order to provide further information.

If a longer investigation is required, we will appoint an investigation team including people with specialist knowledge of the subject matter, where required.

Recommendations for change will also be invited from the investigation team to enable us to minimise the risk of reoccurrence of any malpractice or impropriety which has been uncovered.

Where appropriate, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent us from giving you specific details.

We aim to deal with all investigations in a timely manner and with due regard to the rights of all individuals involved. We recognise that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after the investigation. We will endeavour to inform you if a referral to an external authority has taken place.