


<b>Document Title</b>	Whistleblowing Policy	
<b>Document Reference</b>	1.03.15	
<b>Version</b>	1.0.0.4	
<b>Issue Date</b>	1 <sup>st</sup> January 2024	
<b>Document Author</b>	John F Macleod	
<b>Document Approval</b>	Douglas Leask	
<b>Applicability</b>	All employees	
<b>Pages</b>	3	

## **WHISTLEBLOWING POLICY**

### **1.0 Purpose**

This Whistleblowing policy applies to every employee engaged by Leask Marine Ltd. The aim of the policy is to encourage all employees to report any 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.

### **2.0 Scope**

Leask Marine Ltd is committed to conducting our business with honesty and integrity and we expect all employees to adhere to and maintain these standards in accordance with the Company policies & procedures. Leask Marine Ltd has a culture of openness and accountability to prevent situations occurring or to address them if they do occur. The scope provides employees with guidance as to how to raise concerns and to reassure employees that they should be able to raise concerns without fear of reprisals even if they turn out to be mistaken.

### **3.0 Responsibilities and Requirements**

#### **INTRODUCTION**

This policy applies to all Directors, all employees, all contractors & sub-contractors, agency staff, consultants, work experience or other trainees.

#### **DISCLOSURE**

Whistleblowing is the disclosure of information which relates to suspected wrongdoing which is generally a breach of a legal, statutory, or regulatory requirement or is unethical or immoral. This may include:

- 🕒 Gross misconduct
- 🕒 Breach of a legal requirement such as health & safety obligations
- 🕒 General malpractice such as immoral, illegal, or unethical conduct
- 🕒 Potential breach of Anti-Bribery Act 2010
- 🕒 Breach of the Company's Policies or procedures
- 🕒 Breach of Codes of Conduct or auditable regulations

If you have any genuine concerns related to any of the above, you should report it under this policy. If you are uncertain whether something is within the scope of this policy, you can seek advice from a manager or director of the business.

#### **PROTECTED DISCLOSURE**

An individual making a "protected disclosure" is given statutory protection from victimisation under the Public Disclosure Act 1998 provided the disclosure is in the public interest.

A "protected disclosure" is any disclosure of information which in the reasonable belief of the individual providing the disclosure that one of the following acts is being committed:

- 🕒 A criminal offence

This document is uncontrolled when printed

Page **1** of **3**

PUBLIC

- ☉ A failure to comply with any legal obligation
- ☉ A miscarriage of justice
- ☉ Endangering someone's health or safety
- ☉ Damaging the environment
- ☉ The deliberate concealment of information relating to any of the above.

It is immaterial whether the information is confidential and where the incident occurred. A legal obligation can include a contractual or other civil obligation as well as an obligation under the criminal law.

#### **4.0 Raising the concern**

Leask Marine Ltd will treat all whistleblowing disclosures as confidential and they can be reported to any manager or director of the business. You should make it clear that you are making the disclosure within the Company's terms of whistleblowing policy. This will ensure the recipient of the disclosure realises this and takes the necessary action to investigate the disclosure and to protect the whistle-blowers identity. The disclose will get in touch with you directly to discuss your concern. The aim is to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent you receiving specific details of the investigation or any disciplinary action taken as a result.

You should treat any information about the investigation as confidential. While it cannot always guarantee the outcome, you may have been seeking the business will deal with your concern fairly and in the 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, you can raise this directly with the Managing Director.

#### **5.0 Confidentiality**

Leask Marine Ltd hope that employees feel free to voice concerns openly under this policy, however if you want to raise your concern confidentially, the business will take every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, then this will be discussed with you.

We do encourage employees to raise concerns however if they are raised anonymously the proper investigation may be more difficult or impossible if we cannot obtain further information. In these cases, it is more challenging to establish whether the allegations are credible. The Company is not accountable for maintaining anonymity where you have told others of the alleged misdemeanour.

It is understandable that whistle-blowers are sometimes worried about possible repercussions and Leask Marine Ltd aim to encourage openness and will support any employees that raise genuine concerns under this policy, even if that turn out to be mistaken.

#### **6.0 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. In a case where you feel it is necessary to report to an external body then we strongly encourage you to seek independent advice before reporting a concern externally, and it will be rarely if ever appropriate to contact the media as a first point of contact.

#### **7.0 Review and Monitoring**

This policy will be reviewed as part of the Company's internal audit programme.

#### **8.0 References**

Public Interest Disclosure Act 1998

Signed: 

Name: Douglas Leask, Managing Director

Date: 1<sup>st</sup> January 2024