

**HAMWORTHY PLC**  
**WHISTLEBLOWING POLICY**

**Introduction**

Hamworthy is committed to the highest standards of openness, probity and accountability.

As an employee you have an important role in achieving this goal. Employees will usually be the first to know when someone in the organisation is doing something illegal or improper but often feel worried about voicing their concerns. You may be worried about raising such issues, thinking perhaps that you may be being disloyal to colleagues, feeling it is none of your business or is only a suspicion. You may have decided to say something but are concerned you may speak to the wrong person or raise the issue in the wrong way.

Hamworthy has therefore adopted this policy to enable you to voice concerns at an early stage in a responsible and effective manner.

**If something is troubling you which you think the Company should know about please use this policy. The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.**

**If in doubt – raise it**

It should be emphasised that this policy is intended to assist individuals who believe they may have discovered malpractice or impropriety. The policy is not designed to impact in any way on the Company's proper processes of policy formulation and decision. The ethos of the Company is to foster open, constructive, informed and robust debate on policy formulation coupled with fair decision making having regard to all relevant considerations.

The provisions of the whistle blowing policy may not be used to allow questioning of or appeal against any policy or decisions, contentious or otherwise, of the Company provided that the processes by which the policy or decision has been reached are not improper.

**Scope of Policy**

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

Financial malpractice or impropriety or fraud  
Failure to comply with a legal obligation or Statutes  
Dangers to health & safety or the environment  
Criminal activity  
Improper conduct or unethical behaviour  
Attempts to conceal any of these

**Safeguards**

**i. Protection**

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- in good faith and;

- in the reasonable belief of the individual making the disclosure that it indicates the possibility of malpractice or impropriety and;
- to an appropriate person (see below).

## **ii. Confidentiality**

The Company will treat all such disclosures in a confidential and sensitive manner. This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible but will still be considered. If you ask us to protect your identity we will not disclose it without your approval unless required to do so by law, regulation or court order. If the situation arises where we are unable to resolve the concern without revealing your identity we will discuss with you whether and how to proceed. You may, for example, need to provide a statement as part of the evidence required.

## **iii. Untrue Allegations**

If an individual makes an allegation in good faith no action will be taken against that individual even if the allegation is subsequently unproven. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

## **Procedures for Making a Disclosure**

The Company aims to make all appropriate channels for raising concerns available to you and ensure all matters so raised are handled properly. Various contact details are given below.

Disclosures may be made orally or in writing. You should advise the person you raise the matter with that it is in confidence so they can make appropriate arrangements.

If you have a concern you may raise it through any of the following routes

- direct with your line manager
- through your employer company managing director
- to either the Chief Executive or Finance Director of Hamworthy plc

When contacting any of the above persons we ask that you also advise the Company's senior independent director, Alan Frost, that you have raised a matter under this policy. Alan Frost chairs the Company's audit committee who will monitor the operation of this policy.

If you prefer not to raise the matter with the executive management, for whatever reason, or do not believe the matter has been dealt with properly via these channels you may contact any of the Company's non executive directors listed below.

All contact details are given at the end of this document.

## **How we will handle the matter**

Once you have told us of your concern, we will look into it carefully and thoroughly to assess what action, if any, should be taken. Depending on the nature of your concern, this may mean an internal inquiry or a more formal investigation. We will tell you who your point of contact will be and whether we will need further assistance from you. We may ask you how you think your concern should be best dealt with. If you have a personal interest in the matter or any conflict of interest you must tell us at the outset. Whilst we will try to give you as much feedback as reasonably possible, we may not be able to give you specific details as this could infringe upon the privacy of another individual.

We cannot guarantee that we will respond to all concerns in the way that you might wish, but we will try to handle the matter fairly and properly. By using this policy you will help us to achieve this.

Due to the varied nature of complaints which may involve both internal any external investigators it is not possible to lay down precise timescales for such investigations. If the investigation is a prolonged one you will be kept informed as to its progress as far as reasonably possible.

### **External advice and contacts**

In considering taking a concern outside the Company, you should be aware of your duty of confidentiality and you should consider whether reporting the concern externally, without first giving the Company the opportunity to look into the matter, is the reasonable course of action.

We hope this policy gives you the reassurances you need to raise concerns internally, but if you still feel uneasy, we would rather you raised a concern with an appropriate regulator than not at all. Provided you are acting in good faith you can also contact one of the following regulatory bodies or their equivalent in your jurisdiction.

Health and Safety Executive  
Environment Agency  
Financial Services Authority  
Office of Fair Trading  
Public Concern at Work

### **Contact Details**

Chief Executive            Joe Oatley, tel +44 1202 662698, fax +44 1202 662678  
Mobile: 07920 476707  
email [joatley@hamworthy.com](mailto:joatley@hamworthy.com)

Finance Director         Paul Crompton, tel +44 1202 662699, fax +44 1202 662678  
Email [pcrompton@hamworthy.com](mailto:pcrompton@hamworthy.com)

Hamworthy plc, Fleets Corner, Poole, BH17 0JT, UK

### **Non-Executive Directors**

Gordon Page (Chairman)  
Avon Reach,  
The Close  
Avon Castle  
Ringwood  
Hampshire  
BH24 2BJ  
UK

Alan Frost (senior independent director)  
20 Little Forest Road  
Bournemouth  
Dorset  
BH4 9NW  
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email [alan@alanfrost.co.uk](mailto:alan@alanfrost.co.uk)

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