

## **WHISTLEBLOWING POLICY AND PROCEDURE**

### **1. Policy Statement**

- 1.1** SIG plc is committed to achieving and maintaining high standards with regard to behaviour at work, service to the public and in all its working practices. Workers are expected to conduct themselves with integrity, impartiality and honesty. SIG seeks to develop a culture where inappropriate behaviour at all levels is challenged. To achieve this SIG encourages the reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation.

The Company has established ways and procedures by which you can raise issues which concern you at work and these can be acted upon. At the same time striving to reassure you that in raising concerns you will not be opening yourself to victimisation, detriment, or risking your job security. In addition to what SIG regard as open management, you also enjoy statutory protection if concerns are raised in the right way.

SIG's Whistleblowing Policy is intended to complement statutory protection rather than detract from it. For the avoidance of doubt, your statutory rights will not be affected in any way by the Whistleblowing Policy.

The Public Interest Disclosure Act 1998 (see below) provides workers with protection against victimisation or dismissal should they reasonably and in good faith report concerns.

This policy is accompanied by a procedure that should be followed when "blowing the whistle". The policy is designed to give you that opportunity and protection.

- 1.2** SIG will not tolerate harassment or victimisation of a genuine whistle blower (including informal pressures) and will treat such conduct as gross misconduct, which if proven, may result in dismissal.
- 1.3** SIG reserves the right to amend the policy and procedure as necessary to meet any change in requirements.
- 1.4** If there is anything which you think the Company should know about, please use the procedure. By knowing about malpractice at an early stage the company stands a good chance of taking necessary steps to safeguard the interests of others and protect the organisation. In short, please do not hesitate to "blow the whistle" on wrongdoing.

### **2. What is whistleblowing?**

- 2.1** This policy is designed to deal with concerns raised in relation to specific issues which are in the public interest and detailed in paragraph 2.2 below.

SIG has other policies and procedures that deal with complaints, critical or constructive comments, and appeals. Disciplinary, Grievance, Harassment and Equal Opportunities policies also address standards of behaviour at work. The relevant policy should be followed where appropriate.

- 2.2** Whistle blowing is specific and means a disclosure of information made by a worker or an external person or body where they reasonably believe that one or more of the following matters is happening now, took place in the past or is likely to happen in the future:

- a criminal offence;
- a failure to comply with a legal obligation (e.g. breach of a contractual or other common law obligation, statutory duty or requirement or administrative requirement, including suspected fraud, malpractice or breach of a code of conduct);
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- damage to the environment;
- a deliberate concealment of information tending to show any of the above.

- 2.3** Only genuine concerns should be reported. Disclosures must be made in good faith with a reasonable belief that any information and/or allegation is substantially true, and that the disclosure is not made primarily or solely for personal gain. Malicious or false allegations will be treated as a serious disciplinary offence.

### **3. Who does the policy apply to?**

- 3.1** This policy applies to all employees, including full time, part time and temporaries (regardless of length of service), agents, contractors, suppliers and customers of SIG and its associated companies.
- 3.2** Applicants, or external bodies or agencies not covered in 3.1 above who have genuine concerns about malpractice or illegal acts as outlined in paragraph 2.1 are encouraged to report their concerns.

Please note that whistleblowing is specific to the issues in 2.1 and matters relating to a complaint about your own personal circumstances or an appeal against a decision are addressed through the SIG Grievance Policy and Procedure.

### **4. The Public Interest Disclosure Act 1998**

- 4.1** This policy takes into account the Public Interest Disclosure Act 1998 ("the Act"), which protects workers making disclosures about certain matters of concern, where those disclosures are made in accordance with the provisions of the Act.

The Act does not provide a general protection for whistleblowing that applies in all circumstances. It applies to making a 'protected disclosure' in respect of the specific types of malpractice outlined above.

### **5. The SIG's Whistleblowing Procedure**

#### Workers raising a concern

- 5.1** You should first raise your concern with your line manager or tell an appropriate director. If for any reason you find this difficult you should report the matter to the Group Finance Director who is the nominated executive with responsibility for dealing with concerns raised under this policy and where appropriate ensuring that an investigation is conducted.
- 5.2** Alternatively, you may wish to discuss your concerns, in confidence, with:

*Expolink Europe Limited, 1 Greenways Business Park,  
Bellinger Close, Chippenham, Wilts SN15 1BN  
Telephone 0800 374 199  
E-mail: sigplc@expolink.co.uk*

*Expolink Europe Limited* is an independent body that seeks to ensure that concerns about malpractice are properly raised and a response communicated.

- 5.3** Anonymous allegations are not automatically disregarded but given the safeguards which are in place for those making allegations under this policy, anonymous allegations are usually less powerful than those from named individuals.
- 5.4** If, exceptionally, your disclosure is about a director or senior executive you should report your concerns directly to the Chair of the SIG Audit Committee who will decide how the investigation should proceed.
- 5.5** If you are unhappy with the response that you receive you may report the matter to the Group Chairman. This option will not apply where an allegation has been dismissed following an investigation.
- 5.6** If in doubt, you should speak to the Group Finance Director. Your conversation will be treated in absolute confidence.

## Others wishing to report a concern

- 5.7** Applicants, members of the public and other organisations are encouraged to raise a genuine concern about SIG relating to the areas outlined in 2.2.
- 5.8** You should report the matter to the Group Finance Director who is the nominated executive with responsibility for dealing with concerns raised under this policy and where appropriate ensuring that an investigation is conducted.

## The investigation

- 5.9** The Company will decide how to respond in a responsible and appropriate manner under this policy. An investigation will be conducted as speedily and sensitively as possible. An official written record will be kept at each stage of the procedure.

A decision as to whether a preliminary investigation should be carried out will be made within two weeks of the complaint having been received. Where this is not possible, the person making the complaint will receive an explanation of the delay.

- 5.10** You are entitled to be accompanied by your union representative (if any) or a work colleague throughout the procedure when reporting your concerns.
- 5.11** Your line manager or the person to whom you have raised the concern will investigate your concern/s as follows:
- If appropriate, arrange an initial interview with you within 7 days of complaint to ascertain your area/s of concern. This interview will remain confidential if requested.
  - The notes taken during the interview will be sent to you to approve as an accurate record of what was discussed.
  - You will be asked whether you want your identity to be disclosed and will be reassured about protection from possible victimisation or possible reprisals.
  - You will be asked if you are prepared to make a verbal or written statement (if you have not already done so).
  - Your manager, a more senior director or an external person or body as appropriate, will then conduct further investigations. The investigation may be conducted by the internal auditors, for example in the case of financial irregularity or suspected fraud. They will aim to complete the investigation within 7 working days although in serious or complicated cases, this may not be possible.
  - The person against whom the disclosure is made will normally be told at an early stage, provided with supporting evidence and allowed to respond. However, it may be necessary to conduct the investigation in confidence (i.e. without informing the subject of your allegation/s) until (or if) it becomes necessary to do so. Alternatively, depending on the nature and seriousness of the complaint, the person/s against whom the allegation/s are made may be suspended while investigations are undertaken.

If it is not possible to comply with the timescale set out above, you will be informed and given a revised one.

## Outcome of the investigation

- 5.12** If there is a case to answer, and if appropriate, the disciplinary procedure will be initiated against the person/s who are the subject of the allegation/s.
- 5.13** You will be informed of the outcome of the investigation within 5 working days of completion of the investigation (including any disciplinary investigation). The exact nature of any disciplinary action taken against any person will remain confidential.
- 5.14** Whether there was a case to answer or not, and provided that your disclosure was made in good faith because you reasonably believed it to be true, the Company will ensure that you are protected from reprisal or victimisation as a result of your complaint.

- 5.15** Only where it is established that your allegations were false and made maliciously will disciplinary action be taken against you. Such disclosures will be treated as gross misconduct and may result in your dismissal without notice or payment in lieu of notice.
- 5.16** If, as a result of investigations you are implicated in some way in any wrong doings disciplinary action may be taken against you. The fact that you have blown the whistle will be taken into account if an action is considered.
- 5.17** If you are not satisfied with the outcome of the investigation, you may consider informing other bodies and SIG recognises that workers have a right to make a disclosure about certain matters of concern, as set out in paragraph 2.2 above, to prescribed persons (such as the Health and Safety Executive, the Director General of Fair Trading, the Director of the Serious Fraud Office, the Utility Regulators, the Data Protection Registrar and the Environment Agency).

### **List of key SIG contacts**

Mr Gareth Davies - Group Finance Director  
 Tel: 0114 285 6362  
 Email: gdavies@sigplc.co.uk

Mr Richard Monro – Group Company Secretary  
 Tel: 0114 285 6355  
 Email: richardmonro@sigplc.co.uk

Mr David Haxby - Chair of the Audit Committee  
 Tel: 0114 285 6300

Mr Les Tench - Group Chairman  
 Tel: 0114 285 6300  
 Email: leslietench@sigplc.com

### **List of other external contacts**

Trades Unions

Local Citizens Advice Bureau

**Company Law:** Department of Trade and Industry

**Competition and Consumer Law:** Office of Fair Trading and local authority

**Environmental Issues:** the Environment Agency

**Financial Services and the City:** Financial Services Authority, Head of Listing

Department at the London Stock Exchange, HM Treasury (insurance business), Securities and Futures Authority

**Fraud and Fiscal irregularities:** Serious Fraud Office, Inland Revenue, HM Customs and Excise, Department of Trade and Industry

**Health and Safety Risks:** the Health and Safety Executive and the local authority

**Others:** Certification Officer (fraud and other irregularities relating to the financial affairs of trade unions and employers' associations), Criminal Cases Review Commission (miscarriages of justice), Information Commissioner, Occupational Pensions Regulatory Authority, Audit Commission for England and Wales, National Audit Office Utilities: OFTEL, OFFER, OFWAT, OFGAS, , Public Concern At Work (PCaW), Rail Regulator.

The Group Chief Executive has lead responsibility for policy implementation within the Group and this policy is signed by the CEO to demonstrate the Board's commitment. A copy of this policy is also posted on the SIG plc web site [www.sigplc.com](http://www.sigplc.com).

Chris Davies



**Group Chief Executive**

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