



Policy title: <b>Whistleblowing Policy</b>		
Approved by: Craig Golby		
Position: Managing Director		
 Signature:		
Version no: 5	Revision date: 4/03/2026	

## Introduction

Siamo Group is committed to leading our business with integrity at all times, and expect all employees to maintain high standards of conduct and to report any wrongdoing that falls short of our standards to their Manager, Senior Manager or HR.

## Aims

Siamo Group will work to ensure we;

- advocate that whistle blowing helps us to prevent practices which undermine our company policies or procedures.
- maintain ethical standards and legal compliance.
- ensures that all of our business complies with UK legislation.

Siamo Group supports the provisions of the Public Interest Disclosure Act 1998 (the 'Act'), which legally protects employees and workers from suffering any detriment as a result of speaking out if they have concerns about malpractice in their workplace, provided that their concerns are based on a reasonable belief, even if mistaken, and are not malicious in any way.



## The Public Interest Disclosure Act 1998

The act protects employees who disclose information that any of the following has occurred or is likely to occur in the workplace:

- A criminal offence has been committed or is likely to be committed.
- A person has failed or is likely to fail to comply with any legal obligation.
- A miscarriage of justice has occurred or is likely to occur.
- Where health and safety is being or is likely to be endangered.
- The environment has been or is likely to be damaged.
- If information shows that any of the above is being deliberately concealed.

Examples of what the concern may involve;

- fraud and/or major theft.
- endangering the Health and Safety of others.
- failure to comply with legal obligations.
- employees offering, taking or soliciting bribes.
- criminal activity.
- tax or customs offences.
- negligence in practices of work.
- offences under the Modern Slavery Act 2015.
- mis-reporting performance on business.
- questionable accounting or auditing matters.
- anything that may be suspected to be unlawful or breaches company policy.

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To be protected by the Act individuals must;

- make the disclosure in good faith.
- reasonably believe that the information and allegation is substantially true.
- not act for personal gain.

### **Roles and Responsibilities**

The following mandatory requirements must be attained to be compliant with this policy:

- If an employee raises a concern about an action covered by the Act, they will not normally be at risk of losing their job or suffering any form of retribution as a result. Provided the employee is acting in good faith, it does not matter if they are mistaken.
- Siamo Group will not tolerate any harassment or victimisation of anyone raising a genuine concern under this policy.
- Siamo Group will try to ensure that we do not disclose the identity of an employee who raises a concern without their consent. If an employee provides us with their name we may have to disclose it if the situation arises where we are unable to resolve the concern without revealing their identity, for example the employee's evidence is required to ensure a proper and fair investigation, or for any case which is referred to a court, or if we are legally obliged to.
- If an investigation under this procedure concludes that a disclosure has been made maliciously, in bad faith or with a view to personal gain, the whistleblower may be subject to disciplinary action.
- Siamo Group will take all reports seriously and handle them in a fair and proper manner.

### **Reporting Concerns**

Siamo Group endeavours to actively promote an honest and open workplace culture where we all employees feel empowered to report any concerns to their line manager, or in the event they are unable to do so, they can contact their Senior Manager or HR, in confidence. Alternatively, they can contact the ACAS helpline on 0300 123 1100.