

Whistleblowing Policy Statement

SIP is committed to the highest possible standards of conduct, honesty, and integrity and takes seriously any issues of malpractice or wrongdoing, whether it is committed by an employee, supplier, contractor or customer. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

What Is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangerous activity at work. This may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements
- financial fraud or mismanagement
- bribery
- negligence
- breach of the Company's internal policies and procedures
- conduct likely to damage the Company's reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters

About this Whistleblowing Policy

To assist our employees in addressing concerns of this nature we have in place a Whistleblowing Policy, which:

- encourages employees to report 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;
- provides employees with guidance as to how to raise those concerns and feedback on any action taken; and
- reassures employees that they will be protected from possible reprisals or victimisation, even if they turn out to be mistaken.

How to report any concerns

SIP encourages employees, as a first step, to raise whistleblowing concerns directly with their line managers who may be able to agree a way of resolving the concern quickly and effectively. However, where the matter is more serious, concerns can be referred to the Senior Manager or HR Advise Me.

How we deal with reported concerns

SIP encourages and supports disclosures of suspected or alleged serious malpractice and has appropriate mechanisms in place to facilitate independent, objective and prompt investigations. This mechanism ensures that the individual making the disclosure is protected from potential detriment as a result of actions by persons internal or external to the Company, whilst guaranteeing, as far as is possible, anonymity when requested.

Confidentiality

SIP will do its best to maintain the confidentiality and/or anonymity of both the individual raising the concern and the subject, however it must be appreciated that any investigation process may reveal the source of information and statement may be required as part of the evidence.

The Managing Director shall review this policy annually or following significant changes.

Signed:



Managing Director, SIP Ltd

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