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WHISTLEBLOWING POLICY STATEMENT

Ethical business practice

Ethical business practice is one of our guiding principles and we expect our employees to exhibit the highest standards of conduct and integrity. If you have concerns that someone's conduct is, or could be falling short of these ideals, we want you to speak up about it.

The policy applies to all employees within the Company and reporting channels and procedures are also available to external consultants and contractors whilst they are working for us. In addition, it can be used by members of the public, and is accessible via the company's website: www.bbcfire.co.uk. Whistleblowing on any form of wrong-doing or unacceptable behaviours is always the right thing to do.

Wrong-Doing

The term 'wrong-doing' can cover a multitude of different activities, but in this instance we want to know about behaviours which break the law, are unethical or contravene our vision and values. These include but are not excluded to: -

- Criminal activity including bribery, corruption, fraud or theft
- Breach of a legal obligation
- Miscarriage of justice
- Abuse of authority
- Victimisation, harassment, discrimination or abuse of any person
- Creating a risk or potential risk to health and safety of any person
- Causing damage to the environment
- Concealing or ignoring any of the above

Protection

will protect you, even if you have misinterpreted the situation. However, if you prefer to remain anonymous you can submit your concerns in writing to the Operations Director Nicholas Copeman at our Head Office.

Reporting on wrong-doing without anonymity will not disadvantage your career or affect your relationships at work. We will not tolerate any form of retribution, discrimination or bullying against Whistleblower's who have acted in good faith. If any employee is subjected to harassment or victimisation by colleagues or management as a result of their actions, we will act immediately to stop this and take disciplinary action against the perpetrators.

Additional protection

In certain circumstances whistle blowers are afforded protection by the Public Interest Disclosure Act 1998, popularly known as the 'Whistleblower's Charter', which provides a framework within which workers can and should inform on illegal, unsafe and improper practices by employers or colleagues. Whistleblower's making disclosures that qualify for protection under the Act have the right not to suffer detrimental treatment from their employer. The Act can be accessed via the National Archives site for UK legislation:

<http://www.legislation.gov.uk/ukpga/1998/23/introduction>

It sets out details of the types of disclosures which qualify for protection and the way in which such disclosures can be made.

Seeking advice before you act

If you have concerns or suspicions about wrong-doing, but want advice before speaking up, you can contact the independent charity: 'Public Concern at Work', which runs an advice line: telephone 020 7404 6609.

Malicious allegations

Making a malicious allegation of wrongdoing is a serious offence, and we will take disciplinary action against anyone who does so.

How to raise a concern

If you honestly believe, or have a reasonable suspicion, that wrong-doing is occurring, or is likely to occur, your first step should be to inform your line manager or the head of your department. The information you give will be considered carefully and they will decide whether there are grounds for further investigation.

You will be notified of the intended course of action. If the decision is to proceed with further investigations then a member of the Management Team will contact you to instigate the process. If you prefer, you can always report your concerns directly to any member of the Management Team, or submit them in writing to Operations Director Nicholas Copeman.

Investigation

Where an investigation is required it will be formally initiated. In order to maintain confidentiality and carry out an effective internal investigation the number of personnel involved will be kept to a minimum. In the interests of confidentiality and fairness, you should not discuss the matter any further and you will not be contacted by anyone directly involved in the investigation, unless you provide prior consent for them to do so.

Appeals procedure

If you are unhappy with the conduct or outcome of an investigation, you should raise your concerns with a member of the Management Team or the Operations Director Nicholas Copeman. You must do this within 10 (ten) working days of being notified of the outcome. The matter will review by a member of the Management Team who was unconnected with the original process, and take any further action they deem appropriate. Their decisions will be final.

Policy Statement

BBC Fire Protection recognises that a sound reputation for ethical business practices has been a major factor in the company's success. The Board believes it is essential that we continue to maintain high standards of corporate ethics and demonstrate open, effective and honest communication in our dealings with clients, supply chain members and the general public.

This whistleblowing policy enables anyone to raise genuine concerns, safe in the knowledge that these will be taken seriously. The Board is committed to providing a robust response to any allegations of wrong-doing or irregularity and to protecting the source of such allegations from possible reprisals by colleagues or managers.



Nicholas Copeman
Operations Director

28th April 2016