

# Natural Cement Distribution Ltd

## WHISTLEBLOWING POLICY

We seek to conduct our business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organization, we believe that we can help prevent such situations occurring. We expect all staff to maintain high standards in accordance with [our code of conduct] and to prevent any wrongdoing that falls short of these fundamental principles. It is the responsibility of all workers to raise any concerns that they might have about malpractice within the workplace. The aim of this policy is to ensure that our workers are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

The following guidance sets out the procedure by which staff can report concerns about workplace practices:

1. You should use this policy if you have a genuine concern that there are reasonable grounds for believing that:
  - (a) a criminal offence has been committed, is being committed, or is likely to be committed; or
  - (b) a person has failed, is failing, or is likely to fail to comply with their legal obligations; or
  - (c) a miscarriage of justice has occurred, is occurring, or is likely to occur, or
  - (d) the health and safety of any individual has been, is being, or is likely to be endangered; or
  - (e) the environment has been, is being or is likely to be damaged; or
  - (f) any of the above are being, or are likely to be, deliberately concealed.
2. You must raise your concerns with us in writing. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential.

3. We are committed to investigating disclosures fully, fairly, quickly and confidentially where circumstances permit. Following your submission of a formal written disclosure, we will acknowledge receipt within five working days and make appropriate arrangements for investigation.
4. So far as it is appropriate and practicable, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent us giving you specific details of the investigation or actions taken. It is not normally appropriate to set a specific timeframe for completion of investigations in advance, as the diverse nature of disclosures contemplated makes this unworkable. We will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.
5. Every effort will be made to keep the identity of an individual who makes a disclosure under this policy confidential.
6. No member of staff who raises genuinely-held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action.
7. If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatiously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.