

WHISTLEBLOWING POLICY

DECEMBER 2020



ALFRED H KNIGHT

Whistleblowing Policy

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards.

The Policy's aim is to encourage all employees and others to work at AHK who have serious concerns about any aspect of AHK's activities to voice those concerns without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Policy Statements

1. What is Whistleblowing?

1.1. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

2. When to raise a concern

2.1. Employees should raise a concern where they have the reasonable belief to suspect that a wrongdoing or danger has occurred in the past, is currently ongoing or may happen in the future.

2.2. You should report any serious concerns that you have about AHK's activities, business conduct or the conduct of employees where this conduct:

- makes you feel uncomfortable in terms of known standards;
- is not in keeping with the AHK's business policies;
- falls below established standards of practice across the industry; or
- amounts to improper behaviour.

2.3. For example, this might relate to:

- conduct which is an offence or breach of law;
- conduct which is a breach of ISO regulations;
- solicitation for improper payment or advantage;
- racial, sexual, disability or other discrimination;
- health and safety breaches which affect employees or the public;
- damage to the environment;
- possible fraud and corruption;
- known illegal activities of clients;
- neglect or abuse of clients, or;
- other unethical conduct.

3. Who can raise a Concern

- 3.1. Employees are often the first to realise that there may be something seriously wrong within AHK. Anyone working within AHK is encouraged to report concerns.

4. How to raise a Concern

- 4.1. You can raise a concern using the Compliance Helpline Form. This form can be located on the intranet. You can complete this form anonymously if you wish to do so.
- 4.2. If you wish, you can also raise any concern you have with your manager.
- 4.3. Where appropriate, we will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 4.4. If you are unsure who to contact there are free, confidential and independent organisations who can advise you, details of which are contained at the end of this Policy.

5. Confidentiality

- 5.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, we understand that it is your right to report matters anonymously if you wish.
- 5.2. Where you choose to provide your personal details, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

6. External Disclosures

- 6.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 6.2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work and Protect operate a confidential helpline. Their contact details are at the end of this policy.

7. Protection and Support for Whistleblowers

- 7.1. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.



- 7.2. Anyone who reports a concern under this policy is protected against any form of reprisal unless they have acted maliciously or in bad faith.
- 7.3. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 7.4. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 7.5. However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.
- 7.6. Public Concern at Work and Protect operates a confidential helpline. Their contact details are at the end of this policy.

8. Compliance with this policy

- 8.1. The Compliance Committee will maintain a register containing all concerns brought to their attention.
- 8.2. The Compliance Committee will produce an annual report which will include a summary of all concerns raised, which entity and department they relate to and the area of compliance. The report will not include any employee names.
- 8.3. The aim of this is to ensure that AHK can learn from its past mistakes, improve its practices and have a more consistent approach across the business going forward.
- 8.4. Annual reports will be available for inspection by internal and external audit, after removing any confidential details.
- 8.5. General enquiries regarding compliance with this policy can be made to the Compliance Committee using the below details.

9. General enquiries

- 9.1. The Compliance Committee are responsible for implementing and monitoring of this Policy.
- 9.2. If any employee or person working within AHK requires any further information or guidance relating to this policy or any other compliance matter, how it affects them or when to report a concern, they should contact the Compliance Committee on the details below.
- 9.3. All queries shall be treated confidentially and where requested and practical, with anonymity.

9.4. If following an enquiry or guidance an employee is directed to complete a Compliance Helpline Form, they should do this as soon as possible.

10. Contacts

- 10.1. Compliance Committee
- compliance@ahkgroup.com.
- 10.2. Whistleblowing Officer - Steve Makinson
- 0151 4815894
 - steve.makinson@ahkgroup.com
- 10.3. Public Concern at Work
- (Independent Whistleblowing Charity)
 - Helpline: 020 7404 6609
 - Email: whistle@pcaw.co.uk
 - Website: www.pcaw.co.uk
- 10.4. Protect
- (Independent Whistleblowing Charity)
 - Helpline: 020 3117 2520
 - Email: whistle@protect-advice.org.uk
 - Website: www.protect-advice.org.uk