



**WHISTLE BLOWER POLICY**

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**DOCUMENT CONTROL**

<b>DOCUMENT NAME</b>	Whistle Blowing Policy
<b>ABSTRACT</b>	This document details the Whistle Blowing Policy – guidelines for the management and employees
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**AUTHORISATION**

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<b>VERSION</b>	<b>DATE</b>	<b>PREPARED BY</b>	<b>CHANGES &amp; REASONS FOR CHANGE</b>
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## **1. PURPOSE AND SCOPE**

Invenio is committed to the highest standards of openness, probity, and accountability. An important aspect of accountability and transparency is a mechanism to enable employees and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve the Company and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing, then this information should be disclosed internally without fear of reprisal.

## **2. DEFINITION**

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

## **3. AIMS AND OBJECTIVES**

The aim of this Policy is to encourage employees who have serious concerns about any aspect at to come forward and voice those concerns. The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is intended to encourage and enable you to raise serious concerns rather than ignoring the problem or 'blowing the whistle' externally.

This policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity;
- Ensure you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
- Reassure you that you will be protected from possible reprisals or victimisation if you have made a disclosure in good faith.
- Enable those who become aware of wrongdoing affecting some other person to report their concerns at the earliest opportunity so that they can be properly investigated.

Throughout this process you will be given full support from senior management. Your concerns will be taken seriously and Invenio will do all it can to help you through any investigation.

#### **4. QUALIFYING DISCLOSURES**

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns raised relating to the above matters very seriously. Employees must reasonably believe that the disclosure is “in the public interest”.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Company’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e., it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

#### **5. MAKING A DISCLOSURE**

You should normally raise concerns with:

- Your immediate manager, and or
- The HR Manager

You may make your disclosure in person, by telephone or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information; The nature of your concern and why you believe it to be true; The background and history of the concern (with relevant dates); any evidence you may have.

You are not expected to prove the truth of your suspicion, but you will need to show to the person you raise your concern with that you have a genuine concern related to suspected wrongdoing or malpractice and that there are reasonable grounds for your concern.

#### **6. PROCEDURE**

The Company will respond to your concerns as quickly as possible. To be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The

investigation may need to be carried out under terms of strict confidentiality (i.e. not informing the subject of the complaint until or if it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Within 10 working days of a concern being raised, the person investigating your disclosure will write to you:

- Acknowledging that the concern has been received
- Indicating how the concern will be dealt with
- Explaining what advice and support is available to you; and
- Telling you whether further investigations will take place and, if not, why not

## **7. FORMAL ACTION**

Should formal action be required because of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential measures imposed will be fair and reasonable in line with the relevant policy.

## **8. UNTRUE DISCLOSURES**

If you make a disclosure in good faith and honestly and reasonably believe it to be true, but it is not confirmed by an investigation, will recognise your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain appropriate action (that could include disciplinary action) may be taken.