



ESG 01: Whistleblowing Policy

The Company is committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards. However, all organisations face the risk of things going wrong from time to time or of unknowingly harboring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- 1) To encourage staff 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.
- 2) To provide staff with guidance as to how to raise those concerns.
- 3) To reassure staff that they should be able to raise genuine concerns without fear of reprisals even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

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

- a) Criminal activity.
- b) Miscarriages of justice.
- c) Danger to health and safety.
- d) Damage to the environment.
- e) Failure to comply with any legal or professional obligation or regulatory requirements.
- f) Financial fraud or mismanagement.
- g) Negligence.
- h) Unauthorised disclosure of confidential information.
- i) The deliberate concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**), you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-Harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer (whose details are below), whose contact details are at the end of this policy.

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Raising a Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer, Howard Ellis (HR).

Contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed, should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

Protection and Support for Whistleblowers


It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a 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.

Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

The Company's **Whistleblowing Officer** is **Howard Ellis**.

Details: howard@isisfluid.com

Signed on behalf of:	ISIS Fluid Control Ltd		
Dan Stafford			
Managing Director		Date:	31st January 2025