WHISTLEBLOWING POLICY

Policy Owner: Managing Director
Approved by: Directors
Review Date: Annually (or sooner if legislation changes)

1. Policy Statement

WEINSULATE.CO.UK LIMITED is committed to maintaining the highest standards of honesty, integrity, accountability and ethical behaviour in all aspects of our business.

We encourage all employees and workers to speak up if they become aware of any activity that they reasonably believe is illegal, unethical, unsafe or otherwise contrary to our policies or the public interest.

We are committed to creating an open and transparent workplace where concerns can be raised without fear of retaliation, victimisation or unfair treatment. Every concern will be treated seriously, investigated fairly and handled confidentially wherever possible.

This policy supports the rights of workers under the **Public Interest Disclosure Act 1998**, as incorporated into the **Employment Rights Act 1996**, together with any subsequent amendments.

No employee will suffer dismissal, disciplinary action, discrimination or any other detriment for raising a genuine concern in good faith, even if that concern ultimately proves to be unfounded.

2. Purpose

The purpose of this policy is to:

- encourage employees to report concerns at the earliest opportunity;
- provide a clear process for reporting wrongdoing;
- ensure concerns are investigated fairly, promptly and confidentially;
- protect individuals who make protected disclosures in good faith;
- ensure legal compliance with UK whistleblowing legislation.

3. Scope

This policy applies to:

- Employees
- Directors
- Managers
- Temporary and agency workers
- Apprentices and trainees
- Consultants and contractors
- Self-employed workers engaged by the Company
- Former employees
- Volunteers where applicable

4. What is Whistleblowing?

Whistleblowing is the disclosure of information which a worker reasonably believes is in the public interest and which indicates that wrongdoing has occurred, is occurring or is likely to occur.

Examples include, but are not limited to:

- Criminal offences
- Fraud or financial misconduct
- Bribery or corruption
- Health and safety breaches
- Environmental damage
- Breaches of legal obligations
- Serious professional misconduct
- Deliberate concealment of wrongdoing
- Abuse of vulnerable persons
- Data protection breaches
- Unsafe working practices
- Modern slavery or exploitation
- Bullying or a culture of intimidation where there is wider public interest

Employees do **not** need proof of wrongdoing before reporting a concern. A reasonable belief is sufficient.

5. Matters Covered by Other Procedures

This policy is **not** intended to deal with personal employment grievances such as:

- pay disputes;

- holiday entitlement;
- disciplinary matters;
- performance management; or
- interpersonal disagreements.

These should normally be dealt with through the Company's Grievance Procedure or Dignity at Work Policy.

6. Responsibilities

Directors

The Directors are responsible for:

- promoting an open and ethical culture;
- ensuring this policy remains effective;
- reviewing whistleblowing activity annually;
- ensuring sufficient resources are available to investigate concerns.

Managers

Managers must:

- encourage employees to raise concerns;
- treat all disclosures seriously;
- maintain confidentiality;
- ensure concerns are investigated promptly;
- protect whistleblowers from retaliation;
- report concerns to the Designated Whistleblowing Officer where appropriate.

Employees

All employees are expected to:

- report genuine concerns promptly;
- cooperate with investigations;
- maintain confidentiality;
- act honestly and in good faith.

Knowingly making false or malicious allegations may result in disciplinary action.

7. Designated Whistleblowing Officer

The Company's designated Whistleblowing Officer is:

George Smith-Hutchon
Email: **george@weinsulate.co.uk**

If the concern relates to the Designated Officer, employees should report directly to the Managing Director.

8. How to Raise a Concern

Employees are encouraged to raise concerns as soon as possible.

Concerns should normally be raised:

1. with their Line Manager; or
2. directly with the Designated Whistleblowing Officer if the concern involves their manager or they feel unable to report through normal management channels.

Concerns should preferably be made in writing and include:

- the nature of the concern;
- dates, times and locations where relevant;
- names of individuals involved;
- details of any witnesses;
- any supporting evidence available.

Where an employee cannot submit concerns in writing, arrangements will be made for a confidential meeting.

Employees may be accompanied by a work colleague or trade union representative at any formal meeting held under this procedure.

9. Confidentiality

WEINSULATE.CO.UK LIMITED will make every reasonable effort to protect the identity of anyone raising a concern.

Information will only be shared on a strict need-to-know basis or where disclosure is required by law.

Anonymous disclosures will be considered; however, anonymity may make investigation more difficult and may limit the feedback that can be provided.

10. Investigation Process

All disclosures will be acknowledged within **five working days** wherever practicable.

An independent investigation will normally be commenced promptly.

The investigation may involve:

- interviews;
- document reviews;
- site visits;
- obtaining witness statements;
- consultation with external authorities where appropriate.

Employees raising concerns may be asked to provide additional information during the investigation.

Where appropriate, concerns may be referred under another Company procedure if this is considered more suitable.

11. Outcome

Following completion of the investigation:

- the whistleblower will be informed whether the concern has been upheld, wherever legally possible;
- appropriate corrective action will be taken;
- disciplinary action may be taken where misconduct is identified;
- matters may be referred to external regulators or law enforcement where necessary.

Certain confidential details relating to other individuals may not be disclosed.

12. Protection from Retaliation

The Company will not tolerate any form of retaliation against an individual who raises a genuine concern in good faith.

Examples include:

- dismissal;
- disciplinary action;
- threats;
- intimidation;
- harassment;
- victimisation;
- loss of promotion opportunities;

- unfavourable treatment.

Any employee found to have retaliated against a whistleblower will be subject to disciplinary action, which may include dismissal.

13. Malicious or False Allegations

Employees who deliberately make allegations they know to be false, malicious or misleading may face disciplinary action.

Raising a concern honestly and in good faith will never result in disciplinary action simply because an investigation does not substantiate the allegation.

14. External Reporting

Employees are encouraged to raise concerns internally wherever possible.

However, disclosures may also be made to prescribed external bodies where appropriate, including:

- Health and Safety Executive (HSE)
- HM Revenue & Customs (HMRC)
- Information Commissioner's Office (ICO)
- Environment Agency
- Serious Fraud Office (SFO)
- Equality and Human Rights Commission (EHRC)
- Charity Commission
- Care Quality Commission (where applicable)

A full list of prescribed persons is available on the UK Government website.

15. Data Protection

Any personal information obtained during an investigation will be processed in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Company's Data Protection Policy.

Records will be securely maintained and access restricted to authorised personnel only.

16. Training

All new employees will receive whistleblowing awareness as part of their induction.

Managers will receive periodic refresher training to ensure concerns are handled

consistently, confidentially and in accordance with legal requirements.

17. Policy Review

This policy will be reviewed annually or earlier if required by legislative or organisational changes.

Approved by: Eric Smith-Hutchon - Director
Signed: E Smith-Hutchon Date: 01/05/2026