

Whistleblowing Policy

2025



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1. Aim and Purpose of the Policy

We are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards. Any suspected wrongdoing should be reported to your Line Manager as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers, agency workers, volunteers, Interns, suppliers and customers.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

2. What is whistleblowing

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

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- anti-corruption and bribery;
- facilitating tax evasion;
- financial fraud or mismanagement including money laundering;
- breach of our internal policies and procedures;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- negligence;
- conflict of interest and anti-competitive practices;
- forced labour and modern slavery;
- bullying and harassment;
- the deliberate concealment of any of the above matters.

A **whistle-blower** 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.

3. How to raise a concern

Internal Stakeholders

We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Whistleblowing Officers. Contact details can be located within Section 8 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.

External Stakeholders

External stakeholders, i.e. customers, suppliers and contractors can raise their concerns through the customer services contact platform on the BBI website. Contact details can be located within Section 8 of this policy.

4. Confidentiality

We hope that employees and external stakeholders will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. Investigation and outcome

Once you or an external stakeholder has raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower may be subject to disciplinary action.

6. External disclosures

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.

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. Protect (formerly Public Concern at Work) operates a confidential helpline. Their contact details can be located within Section 8 of this policy.

7. Protection and support for whistle-blowers

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

Whistle-blowers 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 Officers immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

However, if we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower may be subject to disciplinary action.

8. Contacts

Whistleblowing Officers	Brian Long, Director of Business Services +44 (0) 7718 585479 BrianLong@bbisolutions.com
	Nicola Walton, Group Head of HR +44 (0) 7766 143864 NicolaWalton@bbisolutions.com
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: www.protect-advice.org.uk
Customer Service (external stakeholders only)	Website: New Customer Form - BBI Solutions Email: customerservices@bbisolutions.com

9. Responsibilities

You must read, understand, acknowledge and comply with this policy. The members of the Senior Leadership Team (SLT) and the Board will confirm in writing their understanding of this policy.

The BBI Board of Directors has overall responsibility for ensuring this policy complies with BBI's legal and ethical obligations and to take steps to help ensure that everyone in our organisation complies with its values and rules, as far as they are applicable and relevant to their roles.

Management at all levels within the BBI group of companies are responsible for taking proportionate steps to ensure those reporting to them are made aware of and understand this policy and are given adequate and regular training on it as required.

10. Key Performance Indicators ("KPIs")

Key Performance Indicators are reviewed and monitored annually.

11. Policy Monitoring and Review

This policy will be monitored periodically by the organisation to judge its effectiveness and will be updated in accordance with changes in the law.