

## **Purpose**

We strive at all times to conduct our activities with the highest standards of integrity and honesty and we expect all employees to maintain these high standards in all aspects of their work. Internal and external stakeholders are therefore encouraged to report any wrongdoing or actions by employees that fall short of these business principles.

Legislation protects both internal and external stakeholders who report wrongdoing through grievance or complaint mechanisms. This policy aims to ensure that all who report any current, past, or potential future wrongdoing to the Company without concern.

## **Definition**

Whistleblowing is a term used where an individual raises concern(s) about inappropriate, underhand or illegal practices within their organisation. The Whistleblower must reasonably believe that they are acting in the public interest or that they are disclosing information relating to malpractice or wrongdoing and/or the covering up of such.

## **Confidentiality**

We recognise that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that the organisation itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter that concerns them, in the knowledge that it will be taken seriously, treated as confidential, and that no action will be taken against them.

We undertake to ensure that no employee who makes a bona fide report under this policy will be subjected to any detriment, bullying or harassment from another employee. If an employee believes they are being subjected to a detriment by any person within our employment as a result of their decision to invoke the policy, the employee must inform an appropriate person immediately, and appropriate action will be taken.

## **How to make a whistleblowing disclosure**

Each employee is encouraged to set out in writing to the Company any concerns at all about wrongdoing at work, including any criminal offence, failure to comply with legal obligations, miscarriage of justice, health and safety danger, environmental risk or concealment of any of these situations. If appropriate, employees are encouraged to discuss the matter informally with their manager in the first instance. Any formal or informal approach to a manager will be treated as completely confidential. You're protected by law if you reasonably believe that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- A criminal offence, for example fraud
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- A breach of a legal obligation
- You believe someone is covering up wrongdoing

We will consider each disclosure of information sensitively and carefully and decide upon an appropriate response. If the matter requires further investigation, such an investigation will be carried out and the employee will be informed of the outcome and what, if any, action has been taken, if appropriate.

**Commitment to Whistleblower Protection**

We are committed to ensuring that all individuals—whether internal employees or external stakeholders — are able to raise concerns without fear of retaliation.

**Internal stakeholders:** employees, workers, agency staff and former employees.

**External stakeholders:** members of the public, service users, clients, partner organisations, suppliers, subcontractors, community groups, local residents, regulators, and any party affected by Enzygo's operations, services or decisions.

We will ensure that:

- We protect all individuals – internal and external – who raise concerns about wrongdoing
- All disclosures are handled confidentially, with anonymous reporting options where possible
- Retaliation of any kind is strictly prohibited and may lead to serious disciplinary action or referral to external authorities

The disclosure is not protected unless the employee reasonably believes that the disclosure is made in the public interest. If it should become clear that the policy has not been invoked by the employee as outlined above, for example, for malicious reasons or to pursue a personal grudge against another employee or the Company, this will be dealt with in accordance with the disciplinary procedure and may in serious cases lead to the termination of employment. It should also be emphasised that this policy is not designed to question financial or business decisions taken by the Company.