

REAPS MOSS LIMITED

WHISTLEBLOWING POLICY

Introduction

Reaps Moss Limited has a Board of Directors, but there are no employees.

Reaps Moss Limited has appointed a number of suppliers and sub-contractors, those organisations have the responsibility to have an appropriate Whistleblowing Policy.

Reaps Moss Limited is committed to openness and accountability. In line with this commitment we expect those contracted to provide services to Reaps Moss Limited who have serious concerns about any aspect of our work to come forward and voice those concerns with the knowledge that, if made in good faith, their action will be viewed positively.

What our supply chain partners policy should cover

We expect our supply chain partners to have an appropriate Whistleblowing Policy and Procedure in place which gives supply chain partner staff and third parties a clear procedure on how to raise any concerns which do not fall under the remit of the Grievance Policies and Procedures. Whistleblowing is not the same as a complaint. It is about raising concerns regarding malpractice or wrongdoing within Reaps Moss Limited or any supply chain partners.

Any individual wishing to raise any concerns involving this matter should raise them with a Board member.

Whistleblowing Policy and Procedure

Policy Statement

This policy is the definitive policy on whistleblowing. References to whistleblowing in any other policies or documents are superseded by this policy.

The aims of this policy are:

- To encourage individuals to bring concerns to Reaps Moss Limited's attention using informal routes as a starting point where relevant.
- To establish a formal route where informal routes are not appropriate.
- To enable individuals to report suspected malpractice, impropriety or wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate.
- To reassure individuals that they should be able to raise genuine concerns in good faith without fear of reprisals.
- To provide individuals with guidance as to how to raise those concerns.

What is whistleblowing?

The UK Government introduced legislation in the form of the Public Interest Disclosure Act 1998 ('PIDA') which is designed to give protection to individuals who disclose confidential information about malpractice in the workplace. Such disclosures are commonly referred to as 'whistleblowing.'

This may include information relating to:

- actual or suspected criminal offences
- failure to comply with legal obligations
- serious health and safety risks
- damage to the environment
- financial malpractice, impropriety or fraud
- academic or professional malpractice
- deliberate suppression or concealment of any of the above

A 'whistleblower' is an individual who raises a genuine serious concern in good faith relating to any of the above.

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Who / What is covered by this policy?

This policy and procedure makes provision for those contracted to provide services to the Reaps Moss Limited to raise concerns about malpractice, impropriety or wrongdoing within the company and to do so with the knowledge that, if made in good faith, their action will be viewed positively. Whistleblowers will be protected from victimisation.

The whistleblowing procedure should not be used to re-open or review a matter already decided under other policies and procedures.

To whom should a report be made?

Reaps Moss Limited expects an individual to raise any concerns informally with a Board member in the first instance. They may be able to agree a way of resolving the concern quickly and effectively.

What will happen next?

If, on preliminary examination, the concern is judged to be wholly without substance or merit, no further action will be taken and the whistleblower will be informed by the Board member.

If there is a prima facie indication of malpractice, the Board member will arrange for an investigation.

The Board member may appoint another person to undertake the investigation on their behalf.

In cases of a disclosure of a financial nature the Board member may refer the matter to the Company Secretary.

The person who carries out the investigation will report their findings to the Board member.

The Board member will then decide on the course of action to be taken. This may be one or more of the following:

- Take no further formal action, aside to inform the whistleblower of the decision and reasons for it (recommendations may include training, mediation etc.);
- Refer the matter for appropriate action within existing Reaps Moss Limited procedures (e.g. Health & Safety Procedure, Anti-Corruption & Corruption Policy);
- Refer the matter to the police in the case of alleged criminal activities.
- Upon conclusion of an investigation the Board member will let the whistleblower know the outcome.

Notification to the subject(s) of the disclosure

Where there is an investigation, the person or persons identified as the subject of the concern will be informed of each allegation made against him/her and any evidence supporting it and will be allowed to respond before any investigation is concluded.

Confidentiality

Where possible, the identity of the whistleblower will be protected. There may be circumstances, however, where it will not be possible to proceed without revealing the whistleblower's identity, for example if the whistleblower's evidence is needed in the investigatory process.

Note that the need for confidentiality may prevent the designated person from providing the specific details of the investigation or actions taken, to the whistleblower.

The whistleblower should treat any information about the investigation as confidential.

Anonymous Complaints

Reaps Moss Limited cannot investigate anonymous complaints or whistleblowing reports. It would be difficult to establish whether any allegations are credible and have been made in good faith; equally it would be difficult to investigate properly.

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Malicious Allegations

If an investigation under this procedure concludes that a disclosure has been made maliciously, in bad faith or with a view to personal gain, Reaps Moss Limited reserves the right to take appropriate action.

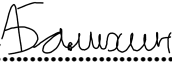
Records

All concerns raised and action taken in response to disclosures will be recorded, and reports on all disclosures and investigations will be retained by Reaps Moss Limited.

Support and Advice

If an individual needs independent advice about a whistleblowing issue, they can contact Protect, the independent whistleblowing charity, who offer a confidential helpline (020 3117 2520). Please see <https://protect-advice.org.uk/> for more information.

The Company will ensure that this policy is reviewed by its Board of Directors and amended as required at least on an annual basis.

Signed: 

Dated: 08/06/2022

Director Alexander Balikhin