



## Whistleblowing Policy

Ashford Colour Press Ltd are committed to providing and maintaining a working environment in which our employees and contractors (“Our People”) feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through the **Grievance Procedure**. Complaints relating to discrimination, victimisation or harassment should be dealt with through the **Grievance Procedure**.

### **Protection**

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns. We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

### **Disclosures under this Policy**

Whistleblowing is the disclosure of any information, formally or informally and regardless of source, which relates to suspected wrongdoing or danger at work. You can make a disclosure under this Policy if you have genuine concerns (past, present or prospective) relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity e.g. fraud, theft, bribery or corruption;
- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Financial malpractice, impropriety or fraud;
- negligence;
- abusing a position of authority
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- Attempts to conceal any of the above

A whistle-blower is a person who raises a concern in good faith relating to 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. You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

This policy is made available to relevant interested parties externally on our website and internally through training and awareness programmes.

### **Confidentiality and Anonymity**

Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

### **How to make a Disclosure**

In the first instance you should bring the matter to the attention of your immediate manager, who will inform a Director . If the disclosure contains allegations about your immediate manager or the malpractice occurs at this level, you may make the disclosure directly to Managing Director.

### **Investigation**

Once a concern has been raised, we will investigate this. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

### **Dissatisfaction with the outcome of the Process**

If you are dissatisfied with the outcome of the investigation, you should raise this with the Managing Director (MD), giving the reasons for your dissatisfaction. MD will respond in writing notifying you of acceptance or rejection of the need for further investigation and the reasons for this.

### **Training**

All of our workers will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this Policy. This Policy will be made available to all employees by inclusion within the Staff Handbook.

All managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any disclosure being made to them.

*R. Hutcheson*

Rob Hutcheson  
Managing Director

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