

WHISTLEBLOWING POLICY



TRAC International Ltd and our subsidiary companies (TRAC) aim to work to the highest standards of ethical business behaviour, social responsibility and integrity. As such, we believe it is of great importance to identify and remedy wrongdoing within the organisation.

The purpose of this policy is to let employees know that they can report wrongdoing in confidence without fear of repercussions. TRAC encourage employees to inform management of malpractice. This policy protects the rights of all workers, including employees, agency staff and contract workers.

What is whistleblowing and what sort of acts should be reported?

Whistleblowing is when an employee reports wrongdoing within an organisation. Such wrongdoing includes:

- a criminal offence i.e. fraud, bribery and corruption;
- the breach of a legal obligation i.e. human rights, discrimination issues, anti-competition;
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- damage to the environment; and
- deliberate concealment of information tending to show any of the above five matters.

The employee needs to reasonably believe that one or more of these matters is either happening now, happened in the past or is likely to happen in the future. Additionally, TRAC would encourage staff to report anything that is in breach of our Code of Conduct.

How to report

Staff should inform their line manager immediately if they become aware that any of the specified actions are happening, have happened or are likely to happen. In more serious cases, the individual can raise the issue with a senior manager, bypassing lower levels of management.

Individuals reporting wrongdoing can ask for their concerns to be treated in confidence; TRAC will respect their wishes.

Once reported, all disclosures will be investigated as promptly and confidentially as possible within the requirements of applicable laws and regulations.

If an individual wishes to make a disclosure confidentially this can be done by emailing via:

<http://anonymousfeedback.net/send-anonymous-email.html>

Protection

Individuals disclosing information about a company are protected by the Public Interest Disclosure Act. This Act protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

Please note that this policy is separate to HR policies and procedures relating to individual/personal grievances e.g. perceived unfairness of decisions or actions. Workers should follow TRAC grievance procedures in such cases – see staff handbooks and HR/personnel procedure (TRACPROC C04).

For and on behalf of TRAC International and subsidiary Companies:

Managing Director	K. Stephen	Signature
Date	28 th January 2021	