



NPORS WHISTLEBLOWING POLICY

NPORS | May 2024 | V1

NPORS Limited 12-14 Brunel Court, Rudheath Way, Rudheath, Northwich, England, CW9 7LP.

NPORS POLICY

WHISTLEBLOWING

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1 About This Policy

- 1.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all, consultants, contractors, training providers, instructors, operators, employers, interns, casual workers, customers, agency workers and members of the general public.
- 1.3 This policy aims to encourage you to report any concerns you may have in relation to illegal or suspicious activity.

2 What is Whistleblowing?

- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.
- 2.2 If you are uncertain whether something is within the scope of this policy you should seek advice from the Compliance Officers: (i) Jason Dickson; and (ii) Scott Johnson, whose contact details can be found in Schedule 1 to this policy.

3 How to Make a Report

- 3.1 In order to make a whistleblowing report, you should contact the Compliance Officers.
- 3.2 Your report should include names, details of the proposed suspicious activity, together with any evidence of such activity.
- 3.3 Your report should be made on a confidential basis, and any concerns should not be raised with any third parties.
- 3.4 Following review of the report, we will arrange a meeting or phone call with you as soon as possible to discuss your concern.

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4 Reports Made

- 4.1 Any report made under this whistle-blowing policy should be based on evidence and genuine reasons for suspicion.
- 4.2 We will be unable to investigate any reports that are made based on personal opinion and lacking in evidence.
- 4.3 If we conclude that a report is made in bad faith and the allegations therein are false, we, together with the accused, may have to take appropriate action against the whistleblower.

5 Confidentiality

- 5.1 We hope that staff 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.

6 Protection and Support for Whistleblowers

- 6.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2 Whistleblowers 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 Compliance Officers immediately.
- 6.3 If, for any reason, you do not wish to make a whistle-blowing report direct to the company, please contact Protect. Protect operates a confidential helpline. Their contact details can be found in Schedule 1.

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7 Investigation

- 7.1 Once you have 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.
- 7.2 In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 7.3 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, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

8 If you are not Satisfied

- 8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 8.2 If you are not happy with the way in which your concern has been handled, you can raise it with our [Complaints Manager Andrew Hodges], whose details are also provided in Schedule 1.

9 Action Taken Following an Investigation

- 9.1 Following the conclusion of an investigation, we will review our procedures and policies to ensure that we are measuring and monitoring risks appropriately.
- 9.2 This Whistleblowing Policy will be reviewed annually by the Compliance Officers, to ensure it's effectiveness.

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Schedule 1

Contacts

Compliance Officers

JASON DICKSON

07903 340474

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SCOTT JOHNSON

07946 346138

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Complaints Manager

Andrew Hodges

07805 555972

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Protect

Independent Whistleblowing Charity

Helpline: 020 3117 2520

Website: <https://protect-advice.org.uk>



SUPPORT AND STANDARDS YOU CAN COUNT ON



NPORS

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