



Paramount International
Whistleblowing Policy
31/08/2021

THE LAW AND OUR ASSURANCES TO YOU

The Public Interest Disclosure Act 1998 now offers a framework of protection against victimisation or for workers who blow the whistle on criminal behavior or other wrongdoing. The Act applies to our workforce, sub-contractors, providers and learners (to be known as the Paramount International Customer).

A disclosure will qualify for protection if, in the reasonable belief of the individual, it relates to one or more of the following actions:

- A criminal offence
- Concerns, suspicions or unease regarding the safety of a child or vulnerable adult
- A failure to comply with a legal obligation
- A miscarriage of justice
- The endangering of an individual's health and safety
- Damage to the environment
- Deliberate concealment of information relating to any of the above.

Disclosure to the employer will be protected, provided that it is made in good faith and the whistleblower has a reasonable suspicion that the alleged malpractice has occurred, is occurring or is likely to occur.

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result.

If a situation arises where we are not able to resolve the concern without revealing your identity (e.g. because your evidence is required in court), we will discuss this with you and agree how to proceed.

While we will consider anonymous reports seriously, it may be difficult to meet some of the undertakings in this policy.



HOW WILL THE CONCERN BE HANDLED?

Anyone notified of a concern must:

- ensure that concerns are taken seriously, treated sensitively and without undue delay
- investigate properly noting relevant details/collecting any documentary evidence before making an objective assessment of the concern
- keep the employee advised of progress
- ensure that the action necessary to resolve a concern is taken.

This process is applicable to both Internal and External Customers.

Once a concern has been raised, the Company is committed to investigating the concern fully to assess what action should be taken. This may involve an internal enquiry or a more formal investigation. You will be advised who is handling the matter, how you can contact him/her and whether your further assistance may be required. On request, the Company will write to you summarising your concern and outlining how the Company proposes to handle it.

On raising a concern, you may be asked how you think the matter might best be resolved. If you do have a personal interest in the matter, you are required to declare this at the outset. If the Company considers that the concern falls more properly within the Grievance Procedure, you will be advised of this.

While the purpose of this policy is to enable the Company to investigate possible malpractice and take steps to deal with it, the Company is committed to providing as much feedback to the individual raising the concern as possible. Please note however, that in certain instances it may not be possible to inform you of the precise action being taken where this would infringe a duty of confidence owed by us to someone else.

EXTERNAL CONTACTS

The Company hopes that this policy gives you the reassurance to raise matters of concern internally however, it is recognised that there may be circumstances where you can make your disclosure more properly to an external body/regulator (e.g. Health and Safety Executive, Environment Agency, Police).



IF YOU ARE DISSATISFIED

If you are dissatisfied with how the matter has been handled, you can go to the other levels and bodies detailed in this policy, refer to the Grievance Policy. Whilst the Company cannot guarantee that we will respond to all matters in the way you might wish, we will endeavour in all instances to handle the matter fairly and properly. By using this policy, you will help us to achieve this.