

Whistleblowing Policy

Simplified Loader (“the Company”) encourages a free and open culture in dealings between its managers, employees, and all people with whom it engages in business and legal relations.

In particular, it recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Company’s success ensured.

This Policy is designed to provide guidance to all those who work with or within the Company who may feel the need to raise certain issues relating to the Company to someone in confidence.

The Policy applies to all entities within the Group and to all individuals working at all levels and grades; this includes directors, senior managers, employees, agency employees and any other person working for the Company wherever located (hereon in collectively known as “Employees”). Employees who raise genuine concerns in the public interest under this Policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

Procedure

1. This Policy will apply in cases where Employees genuinely believe that one of the following sets of circumstances is occurring, has occurred or may occur within the Company and that it is in the public interest for them to disclose it. Circumstances that may be disclosed in this way include:
 - a) A criminal offence has been committed, is being committed or is likely to be committed;
 - b) a person has failed, is failing or is likely to fail to comply with any legal or contractual obligation to which he or she is subject;
 - c) a miscarriage of justice has occurred, is occurring or is likely to occur;
 - d) the health and safety of any individual has been, is being or is likely to be endangered;
 - e) the environment has been, is being or is likely to be damaged;
 - f) the treatment of an individual / group has been detrimental, for example bullying, harassment or in breach of equality regulations;
 - g) an offence has been, is being committed or is likely to be committed in relation to the Bribery Act 2010 (see also point (a) above);
 - h) the information security of the business is at risk or has been breached;
 - i) information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

2. There is no need for an Employee to prove that the breach or failure that they are alleging has occurred or is likely to occur; reasonable suspicion will suffice i.e. where the Employee reasonably believes that the information disclosed is substantially true. Employees should, however, note that they are not entitled to make a disclosure if, in so doing, they commit a criminal offence.
3. If Employees wish to raise or discuss any issues which might fall into one of the categories listed above, they should contact the Company's Managing Director. This person will, insofar as is possible, treat the matter in confidence. It is likely that an investigation will be necessary and the Employee who has made the disclosure may be required to attend an investigatory hearing and/ or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the Employee's working relationships are not prejudiced by the fact of the disclosure.
4. If Employees reasonably believe that the relevant failure (i.e. one of the set of circumstances listed above) relates wholly or mainly to the conduct of a person other than their employer or any other matter for which a person other than the Company has legal responsibility, then they should make that disclosure to that other person.
5. Also, should an Employee believe that disclosure within the Company is inappropriate or has been unsuccessful, advice can be obtained from <https://www.gov.uk/whistleblowing/who-to-tell-what-to-expect>. Disclosures made to Employees' legal advisors in the course of obtaining legal advice will be protected.
6. Employees should be aware that this Policy will apply where they reasonably believe that the information disclosed, and any allegation contained in it are substantially true. If any disclosure concerns information which an Employee does not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the Company's disciplinary policy and procedures and may constitute gross misconduct for which summary dismissal is the sanction.
7. While the Company hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.
8. An Employee who makes a disclosure is protected from detrimental treatment by the Company, a co-worker or by an agent of the Company. If this occurs, it should be raised immediately with the line manager so that the matter can be investigated thoroughly without undue delay. Detrimental treatment includes, for example, harassment and bullying or not complying with a person's rights and entitlements under his or her contract of employment.
9. An Employee is also protected from dismissal by the Company for making a protected disclosure. There is no qualifying period for an unfair dismissal claim to be made to an employment tribunal.

Authorized signatory



Puneet Vishnoi (General Manager)

Simplified Loader

Signed on: 05-Sep-2024