

## Introduction

The aim of this policy is to encourage you to raise any concerns you might have about certain wrongdoings within the company without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately. No action will be taken against anyone who raises a concern in accordance with this procedure.

This procedure does not give contractual rights to individual employees, workers or contractors. The company reserves the right to alter any of its terms at any time.

## Eligibility

This procedure applies to all employees, apprentices, workers and anyone else who has a contract to carry out work for us personally. It does not apply to self-employed workers who run a profession or business on their own account.

## Scope

You should not use this procedure for complaints relating to your own circumstances, such as the way you have been treated at work. In those cases, you should use the grievance procedure. This procedure is for making a disclosure of wrongdoing or malpractice where you reasonably think that disclosure is in the public interest. If you are uncertain whether or not something is within the scope of this policy, you should seek advice from the HR Department.

If you believe that we, or any of our workers, has taken, is intending to take or has failed to take action that you reasonably believe could lead or amount to:

- a criminal offence including bribery, theft or fraud;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- damage to the environment, or
- the deliberate concealment of information concerning any of the matters listed above

As soon as you become aware of suspected wrongdoing, speak to your line manager. If you feel you are unable to raise this matter with them or they haven't fully addressed your concern, you may wish to raise this with a Senior Manager. If this is not possible, or you feel it is inappropriate to do so you can contact the confidential whistleblowing service at [speakup.uk@7-steel.com](mailto:speakup.uk@7-steel.com).

Any concerns covered by this procedure should be raised with the company to allow us the chance to deal with them. You should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

## Investigation

If you disclose information in accordance with this procedure, wherever reasonably practicable we will keep your identity confidential. We discourage anonymous disclosures as they are likely to hinder effective investigation.

We will investigate your allegation promptly. During the course of our investigation we may require your assistance. 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 or any disciplinary action taken as a result. We will inform you of the outcome of the investigation as soon as practicable and you should treat information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will deal with your concern fairly and in line with policy.

## Compliance

We may take disciplinary action against a person who does not act in accordance with this procedure.

Issues raised through this process should be made in good faith, but we know mistakes can be made. As long as it's made with honesty it won't matter if your concern turns out to be a mistake and you won't suffer any detrimental treatment as a result. This assurance isn't extended to anyone who makes allegations that are malicious, for personal gain or simply to cause harm, irritation or distress to others. In this case disciplinary action may be taken, with potential outcomes being up to and including dismissal.

Examples of victimising another person for using this procedure or deterring any person from reporting concerns under this procedure will not be tolerated and may result in disciplinary action being taken, with potential outcomes being up to and including dismissal.