



SPEAK UP POLICY (WHISTLEBLOWING)

Introduction

Fortel Group(Fortel) takes all forms of malpractice or impropriety extremely seriously. The Speak Up policy (also known as the Whistleblowing Policy) sets out how stakeholders should report concerns of malpractice and wrongdoing and explains how Fortel will respond to those concerns.

Speaking up (or whistleblowing) is the responsibility of everyone in Fortel. We all have a responsibility to uphold our values, adhere to the law, fulfil our contractual commitments and conduct our business in an ethical way. Our employees and supply chain partners are often the first people to witness wrongdoing and through this policy we encourage them to Speak Up at the earliest possible stage and report their concerns so that Fortel can take appropriate action.

Scope

All Fortel employees, consultants, temporary and agency workers, and anyone on a contract for services. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Any other individual or organisation such as a supplier, customer or family member are also encouraged to report concerns regarding the conduct of Fortel or anyone acting on our behalf.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, queries about pay or co-worker disputes. In those cases you should use the Grievance Procedure. If you are uncertain whether something is in the scope of this policy you should seek guidance from the Commercial and Compliance Director or Fortel's HR Department or the independent charity Protect (contact details may be found at the end of this policy).

Objectives

- To support the current legal requirements of the Public Interest Disclosure Act 1998.
- To support the company's values.
- To ensure employees can raise concerns without fear of suffering retribution.
- To provide a clear and confidential procedure.
- To strengthen risk management and avoid reputational damage by addressing issues at an early stage before they crystallise.

Principles

1.0 Overview

Any concerns raised will be treated fairly and properly.

- We will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity unless they agree otherwise.
- We will ensure that the individual raising the concern is aware of who is handling the matter.
- We will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. We do not however extend this assurance to someone who maliciously raises a matter they know is untrue.

2.0 Malpractice

The types of conduct regarded as malpractice for the purposes of this policy include but are not limited to:

- Fraud, impropriety, or financial malpractice
- Corruption, bribery or blackmail
- Suspected breaches of the Modern Slavery Act 2015



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- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Miscarriage of justice
- Endangering the health and safety of an individual
- Endangering the environment
- Negligence
- Serious breach of any internal policies and procedures
- Conduct likely to damage Fortel's reputation
- Unauthorised disclosure of confidential information
- Attempts to conceal any of the above

The malpractice can be past, present or prospective. It may have occurred inside or outside the United Kingdom.

3.0 Raising Concerns

If you have a concern about malpractice, you can speak to your Line Manager.

Alternatively, you can raise the matter with Fortel's Commercial and Compliance Director or Fortel's Human Resources Director.

Allegations received through other channels, for example social media, and that are deemed to fall within the scope of this policy will be investigated using the approach set out below.

4.0 Our Approach

Once we have become aware your concerns will be referred centrally to the Commercial and Compliance Director who will assess the case and an Investigating Officer will be assigned to look into the matter to establish the facts. The investigation will be completed within a reasonable period, bearing in mind the circumstances and frequency of the alleged malpractice.

The Investigating Officer may try to contact you to obtain further information about the case although you will still have the opportunity to preserve your anonymity subject to external processes (such as criminal proceedings) where the release of information may be outside Fortel's control.

We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.

We will not disclose your identity without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (e.g. if your evidence is required in court), we will discuss with you whether and how we can proceed.

5.0 Advice

If you are unsure or you require independent advice at any stage, you may contact the independent charity Protect (Formally Public Concern At Work) on 02031172520. Their advisors can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work. (<http://www.pcaw.co.uk/>).

6.0 Confidentiality

Appropriate measures can be taken to preserve confidentiality of the information provided subject to external processes (such as criminal proceedings) where the release of information may be outside Fortel's control. If you are in doubt you can seek advice from Protect, the independent whistleblowing charity. Contact details can be found above.



7.0 Protection and Support for Whistleblowers

Fortel aims to support workers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Fortel will not seek to identify the identity of individuals that choose to remain anonymous.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager, Fortel's Commercial and Compliance Director or Fortel's Human Resources Director immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such action you may be subject to disciplinary action.

End
