

Whistleblowing Policy

1. Purpose and Statement of Intent

Kernow Fixings Ltd ("the Company") is committed to conducting its business with honesty, integrity, and the highest standards of openness, probity, and accountability. The Company expects all those who work for or on its behalf to maintain these standards at all times.

The purpose of this policy is to provide a framework through which employees and workers may report, in confidence, any genuine concerns regarding wrongdoing, malpractice, or impropriety within the organisation, in the knowledge that such concerns will be taken seriously, investigated appropriately, and that they will be protected from detriment as a consequence of having raised them.

2. Legislative and Regulatory Framework

This policy is established in accordance with, and should be interpreted in the context of, the following legislation and guidance:

- The **Public Interest Disclosure Act 1998 (PIDA)**, which amended the **Employment Rights Act 1996** to provide statutory protection for workers who make qualifying disclosures in the public interest;
- The **Employment Rights Act 1996**, as amended, in particular the provisions governing protected disclosures and detriment;
- The **Enterprise and Regulatory Reform Act 2013**, which introduced the requirement that a qualifying disclosure be made in the reasonable belief that it is in the public interest;
- Relevant guidance issued by the **Department for Business and Trade** concerning whistleblowing for employers and workers, and the published list of **prescribed persons and bodies** to whom disclosures may be made.

Where the Company's obligations under this policy intersect with other statutory duties — including those arising under health and safety, environmental, data protection, or bribery and corruption legislation — this policy shall be applied consistently with those obligations.

3. Scope

This policy applies to all employees, workers, contractors, agency workers, and volunteers engaged by the Company. It does not form part of any employee's contract of employment and may be amended at any time.

This policy is distinct from the Company's Grievance Procedure. Matters concerning an individual's own employment, terms, or treatment should be raised under the Grievance Procedure rather than under this policy.

4. Definition of Whistleblowing

Whistleblowing refers to the disclosure by a worker of information relating to wrongdoing, risk, or malpractice that affects others, such as the Company, its customers, the wider public, or the environment. In law, such a disclosure is termed a "qualifying disclosure."

A disclosure will qualify for protection where the individual making it holds a reasonable belief that the disclosure is made in the public interest and that it tends to show one or more of the following:

- That a criminal offence has been committed, is being committed, or is likely to be committed;
- That a person has failed, is failing, or is likely to fail to comply with a legal obligation to which they are subject;
- That a miscarriage of justice has occurred, is occurring, or is likely to occur;
- That the health or safety of any individual has been, is being, or is likely to be endangered;
- That the environment has been, is being, or is likely to be damaged;
- That information tending to show any of the above has been, is being, or is likely to be deliberately concealed.

5. Protection Afforded to Those Raising Concerns

The Company will not tolerate the subjection of any individual to dismissal, detriment, victimisation, harassment, or other disadvantage as a consequence of raising a genuine concern in line with this policy.

An individual is not required to demonstrate that wrongdoing has occurred, nor to undertake any investigation themselves; it is sufficient that they hold a reasonable belief that the concern is genuine and that disclosure is in the public interest. Where a concern is raised in good faith but is subsequently found to be unsubstantiated, no action will be taken against the individual concerned.

The Company regards the making of knowingly false, frivolous, or malicious allegations as a serious matter, which may result in disciplinary action.

6. Confidentiality

All disclosures will be handled sensitively and treated as confidential. The identity of the individual raising a concern will be protected so far as is reasonably practicable and will be disclosed only where necessary for the proper investigation of the matter or where required by law. Where it becomes necessary to disclose an individual's identity, the Company will, wherever possible, discuss this with the individual in advance.

The Company will endeavour to accommodate concerns raised anonymously; however, individuals are encouraged to identify themselves, as anonymity may limit the Company's ability to investigate effectively or to provide protection and feedback.

