

WHISTLEBLOWER POLICY

1. Introduction

Mondottica aims to provide clarity to all staff regarding policy obligations, entitlements, and expectations, ensuring all staff fully understand and benefit from the policy provision. We will ensure our policies are up to date, to provide you with the appropriate guidance, and in return expect you to read and comply to the guidance or rules.

Our Company Values: Integrity, Respect, Customer and Excellence underpin our policies and if you have feedback or questions on how they may be improved please contact the policy owner.

The purpose of the Whistleblower Policy is to set out the way in which individuals may raise any concerns of fraud, misconduct or wrongdoing that they have and how those concerns will be dealt with.

2. Scope

This policy applies to all Employees (full or part-time) whether permanent or temporary, and officers of the company. (for the purposes of this policy collectively known as 'Staff') Other individuals performing functions in relation to the organisation, such as Consultants, agency workers, volunteers, interns and contractors, are encouraged to use it.

'Mondottica', 'We', or 'Us', will be used interchangeably within this document.

Unless otherwise stated this policy is non-contractual.

3. General

It is important to us, that any fraud, misconduct or wrongdoing by Mondottica staff is reported and properly dealt with. Mondottica therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. We also refer you to our Equality, Diversity and Inclusion policy, and our Grievance policy under which you can raise concerns not specifically listed below.

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4. Policy

4.1 The law

The law provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a member of staff who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety.
- an act causing damage to the environment.
- a breach of any other legal obligation or
- concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for the staff to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. Staff have no responsibility for investigating the matter - it is Mondottica's responsibility to ensure that an investigation takes place.

Staff who make such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or singled out for unjust treatment (i.e. Victimised) because they have made a disclosure.

Mondottica encourages staff to raise their concerns under this procedure in the first instance, either directly through the procedure below, or by using the anonymous <https://forms.office.com/r/RBbE7EZAe4> If you are not sure whether to raise a concern, you should discuss the issue with the HR team.

4.2 Guidance to ensure the prevention and elimination of wrongdoing.

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.

No member of staff will be victimised, (that is treated unfairly or subject to detrimental treatment), for raising a matter under this procedure. This means that

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the continued employment and opportunities for future promotion or training of the individual will not be prejudiced because they have raised a legitimate concern.

Under UK law, victimisation of a member of staff for raising a qualified disclosure will be a disciplinary offence.

If misconduct is discovered as a result of any investigation under this procedure the disciplinary procedure will be used, and maliciously making a false allegation is a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to a director.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If there is concern that a member of staffs own contract has been, or is likely to be, broken, they should use the grievance procedure.

4.3 Procedure if wrongdoing is suspected

- a) If you have concerns of wrongdoing, you should in the first instance, raise your concerns with the HR Director. If for any reason you do not wish to approach the HR Director, or you feel they are involved in the wrongdoing then you should notify the COO or the CEO.
- b) Any approach will be treated with the strictest confidence and the staff identity will not be disclosed without their prior consent. Whilst we encourage staff to raise concerns directly, we have a <https://forms.office.com/r/RBbE7EZAe4> to allow you to raise concerns anonymously. Any messages received through this facility will go directly to all of the HR Director, COO and CEO.
- c) The HR Director will notify the COO and/or CEO, (unless either are alleged to be involved in the wrongdoing) and an independent investigation committee will be assembled. The Committee will consist of 3 senior and independent staff who will investigate the matter in confidence. The investigation may involve the member of staff and other individuals involved giving a written statement, providing other evidence or commenting on any additional evidence obtained. The investigation will be concluded, and the findings reported to either or all of the HR Director, CEO and COO, and any appropriate or necessary action will be taken (this may include reporting the matter to any appropriate government department or regulatory agency). If disciplinary action is required, this will be followed up with the support of the HR team. On conclusion of any investigation, the investigating committee will also ensure the member of staff will be told the outcome of the

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investigation and what has been done, or is proposed to be done, about it. If no action is to be taken, the reason for this will be explained.

d) If on conclusion of the steps above, the member of staff reasonably and genuinely believes that the appropriate action has not been taken, they should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs
- the Financial Conduct Authority
- the Competition and Markets Authority
- the Health and Safety Executive
- the Environment Agency
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

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