

WHISTLEBLOWING POLICY

Our business is run in accordance with the law. No employee will suffer a detriment for speaking up if they believe that something is wrong.

If you have information you believe shows any of the following:

1. A criminal offence was committed or is being or is likely to be committed;
2. A person has or is or is likely to fail to comply with a legal obligation;
3. A miscarriage of justice has occurred or is or is likely to occur;
4. The health and safety of any individual has been or is being or is likely to be endangered;
5. The environment has been, is being or is likely to be damaged;
6. That information tending to show any matter falling within any one of the above categories has been, is being, or is likely to be deliberately concealed.

Please raise your concerns immediately with a member of senior management or the HR Department.

After you have raised a concern, we will decide how to respond in a responsible and appropriate manner. Initially this will usually involve making internal enquiries but it may become necessary to carry out a full investigation which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

We will keep you informed of progress and let you know when the investigation is completed. We will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others.

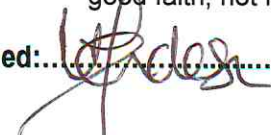
If you use this policy to raise a concern in good faith, we can assure you that you will not suffer any form of retribution or detrimental treatment.

Any person who criticises or victimises a bona fide whistle-blower will be liable to disciplinary action.

Anyone who maliciously makes a false allegation will also be liable to disciplinary action.

Alternatively, you will be protected in law if you disclose the information to the following third parties:

1. A legal adviser in the course of getting legal advice;
2. A Minister of the Crown;
3. To one of the prescribed persons set out in the Public Interest Disclosure (Prescribed Persons) Order 1999 (e.g. health and safety problem disclosure is to the Health and Safety Executive; fraud: Secretary of State for Trade and Industry; consumer protection matters: Local Authority Consumer Protection unit; tax matters: The Inland Revenue) or
4. A person other than those set out above where you act in good faith, reasonably believe the information to be substantially true, do not make the disclosure for personal gain, it is in all the circumstances reasonable to make the disclosure and
 - a) you reasonably believe you will be subjected to a detriment if the disclosure is made to the Company or the Prescribed Person;
 - b) there is no Prescribed Person and you believe the wrongdoing will be concealed or destroyed by the Company; or
 - c) you have previously disclosed the same information to the Company or the Prescribed Person;
 - d) Any other person where the disclosure is one of an "exceptionally serious failure" made in good faith, not for personal gain, where it was reasonable to make the disclosure.

Signed:  Mark Henderson Date: 01/02/18 Position: CEO

Prepared By Karla Swain	Reviewed By Martyn Howells	Approved By Mark Henderson	Issue: 4 Rev 01 February 2018
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