

Purpose

It is the policy of Xodus to ensure that the highest standards of business conduct are maintained and that a culture of integrity and honesty within the Company's business prevails. Accordingly, all staff are expected to carry out their duties in an ethical manner and to report any instances of malpractice of which they become aware. In such circumstances Xodus' Speak Up (Whistleblowing) Policy is designed to ensure that staff can do this in confidence, at an early stage and in the right way, without detriment or risk to their employment.

Who Is Covered By This Policy?

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as staff in this policy).

What Is Whistleblowing?

The Public Interest Disclosure Act 1998 provides staff with legal protection from any form of retribution, victimisation or detriment as a result of making a protected disclosure. To be entitled to this protection the disclosure must, in the reasonable belief of the person making the disclosure, show:

- 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 any legal obligation to which they are subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health and 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; or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Management will ensure that any concerns as to malpractice raised in accordance with the following Procedure will be investigated and appropriate follow-up action taken. In addition, all disclosures made in accordance with this Procedure will be treated in the strictest confidence.

Procedure

If you're concerned that the law or our Code is being broken, it's your responsibility to report it. Any disclosure should be raised initially with your Line Manager, either verbally or in writing.

If you feel unable to raise the matter with your Line Manager or feel that in the circumstances it would be inappropriate to do so, the disclosure should be made to one of the directors, Human Resources, Legal or Compliance contact or indirect manager.

If you don't feel comfortable with any of those options, then contact our confidential reporting helpline, Safecall, which is operated by a company independent of Xodus Group.

Staff are not expected to wait until they have proof to raise concerns or to investigate any matter themselves.





Speak Up (Whistleblowing) Policy

Following a disclosure, an investigation will be held. If deemed necessary, an independent party (or parties) may be brought in to carry out this function. In the course of this investigation you may be called upon as a witness.

Feedback and, where appropriate, details of the outcome of the investigation will be given to you.

Safecall – Report a concern by phone or online

Wherever you are, you can contact your, free and confidential, “Speak up” service 24/7 by calling Safecall on 0800 915 1571

If you are outside the UK please use our International Free Phone Number +800 7233 2255 or +44 191 516 7749

Your report won't be traced and Safecall has trained operators to support you.

It's open 24 hours a day, 7 days a week.

www.safecall.co.uk

It should be noted that any person making a disclosure must act in good faith and have reasonable grounds for believing that malpractice has occurred, is occurring or is likely to occur. It is understood that genuine concerns may be raised that prove subsequently to be misplaced. Disciplinary action may however be taken against staff who maliciously raise a matter they know to be untrue or who act other than in good faith. The harassment or victimisation of any staff using this whistleblowing procedure will not be tolerated.

Stephen Swindell

Managing Director

