

# Reporting Policy / Procedure

## 'Whistle-blower Code'



### Introduction

John Cotton Group Ltd (the "Company") is committed to maintaining compliance with all applicable laws and Regulations.

Any Company Employee may submit a good faith complaint or concern regarding Human Rights issues. Any Interested party may also submit a good faith complaint or concern regarding Human Rights issues.

This Code is designed to ensure Employees or Interested parties can report wrongdoing or potential wrongdoing and, provided they are acting in good faith, they have a right not to suffer any detriment by virtue of having made a report.

However, the Code does not give any Employees reporting a wrongdoing protection from disciplinary action should they be a party to the wrongdoing or if they are deemed to have benefited from the wrongdoing either currently or at some point in the past.

Complaints that do not count as whistle blowing are:

Personal grievances – these are covered in the Company grievance procedure.

### Status of this Code

This Code does not give contractual rights to individual employees, workers or contractors.

### Scope

For the purposes of this Code, Employees means all persons employed by the Company on a contract of employment. Interested parties are any individuals and communities that may be impacted by contact or business with the Company.

The Code applies equally to all Employees of the Company or Interested parties.

A Good Faith Report of Wrongdoing (a "Report") is a Report, made in good faith, of information which, in the reasonable belief of the person making the Report is true and tends to show that one or more of the following (an "improper action") has been committed, is being committed, or is likely to be committed:

- A criminal offence (such as fraud or theft).
- Someone's Health & Safety is in danger.
- Risk or Actual damage to the environment.
- Miscarriage of Justice.
- The Company is breaking the law.
- You believe someone is covering up wrongdoing.
- Breaches of UNGP (United Nations Guiding Principles) on Human Rights.
- Breaches of the Company Code of Conduct or any other Company code or policy.
- Breach of systems or codes of practice which may be applicable.
- Any fraud or deliberate error made on a financial statement.
- Deliberate concealment relating to any of the above.

Issue: 01

Date: December 2017

Approved By: Mr Stephen Swalwell

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The improper action may have occurred in the past, be currently occurring or be likely to occur. Reports should be made as promptly as practicable. No Employee or Interested party will suffer any victimisation or detriment for making a Report, provided the Report is made in good faith and where the Employee or Interested party concerned reasonably believes that the information disclosed, and any allegation contained in the Report is substantially true.

Employee's or Interested party's concerns will be treated seriously, and each case will be considered on its own facts. To the fullest extent practicable, Reports and any subsequent investigation will be treated in confidence. However, in certain circumstances, Employees or Interested parties should be aware that disclosure to third parties may be required by legislation, a governmental body or agency, a regulatory Code of Conduct or by a Court or Tribunal. In some cases, Employees or Interested parties may be called upon by a Court or other Tribunal to give evidence regarding the subject matter of the Report. In such circumstances, reasonable support will be provided to the Employee.

If any Report is made in bad faith, for instance maliciously, in order to cause disruption to the Company, or contains information that the person making the report does not believe is substantially true, or if the disclosure is made for personal gain; such report may be treated as the basis for a disciplinary matter under the Company's Disciplinary Procedures for its employees.

### Procedures for reporting

If an Employee or Interested party wishes to make a Report the following process should be followed:

- A Report may be submitted in writing, using electronic or regular mail, by telephone or personal visit to the Company Secretary or to the Employee's own manager.
- If a Report is submitted to the employee's Manager the Report must then be submitted to the Company Secretary by the Manager.
- All reported cases will be logged to ensure appropriate retention.
- Interested parties shall make the report to the Company Secretary using the same process excluding the employee's manager step.
- The Company Secretary will discuss such Reports with appropriate personnel or such other officers and employees of the Company and third parties as are deemed appropriate and arrange for such investigation as may be necessary to be undertaken.

External investigation may be undertaken, or external advisers consulted in circumstances where it is deemed appropriate. In some cases, the receipt of the Report will trigger an obligation on the part of the Company to report the matter to external Regulatory Authorities.

For further information please see link below

<https://www.gov.uk/whistleblowing>

Whistle blowing contact person: Mr Stephen Swalwell. Company Secretary

Whistle Blowing telephone line: 01924 483228

Whistle Blowing e mail: steves@johncotton.co.uk

Whistle Blowing surface mail address: John Cotton Group Limited

Nunbrook Mills, Mirfield

West Yorkshire. WF14 0EH

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