

ADMINISTRATION

WHISTLEBLOWING POLICY

1. Policy Statement

At Contract Solutions Scotland Ltd., we are committed to promoting a culture of openness, accountability, and integrity. This Whistleblowing Policy enables workers and other stakeholders to raise concerns about wrongdoing or risk within the company without fear of reprisal.

We are committed to complying with all relevant Scottish and UK legislation and encourage the early disclosure of concerns to help us prevent or address misconduct, malpractice, and potential harm to people, the environment, or the business.

2. Purpose

This policy aims to:

- Encourage staff to report suspected wrongdoing or risks at the earliest opportunity.
- Outline clear channels for disclosure.
- Comply with Scottish and UK legislation, including the **Public Interest Disclosure Act 1998** and associated **Scottish employment laws and regulatory obligations**.
- Provide reassurance that individuals making disclosures in good faith will be protected from victimisation or retaliation.

3. Scope

This policy applies to:

- Employees (full-time, part-time, or temporary)
- Contractors and agency workers
- Consultants & suppliers
- Apprentices, trainees, and volunteers

Whistleblowing concerns may relate to actions by Contract Solutions Scotland Ltd. any of its employees, or third parties affiliated with the business.

4. What Can Be Reported?

The following are examples of concerns that may be raised under this policy:

- Criminal offences (e.g. theft, fraud, bribery)
- · Breaches of health and safety law
- Risks to public health or the environment (e.g. illegal discharges or breaches of SEPA permits)
- Failure to comply with legal obligations under Scottish or UK law
- Misuse of company resources or data
- Improper conduct, harassment, or unethical behaviour
- Any attempt to conceal or cover up wrongdoing



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5. Raising a Concern

You may raise a concern verbally or in writing with:

- Your Manager
- Your Team Lead
- The Managing Director

If you feel you cannot raise the issue internally, you can contact an external "prescribed person" under the **Public Interest Disclosure (Prescribed Persons) Order 2014**. For environmental concerns in Scotland, this includes:

• SEPA (Scottish Environmental Protection Agency)

Other relevant bodies may include:

- Health and Safety Executive (HSE) for safety concerns
- Audit Scotland for public interest financial concerns
- Information Commissioner's Office (ICO) for data protection breaches

6. Confidentiality

Your identity will be protected as far as possible. Information will only be shared on a strict need-to-know basis. Anonymous concerns are accepted, though identifying yourself may help us resolve the matter more effectively.

7. Protection from Retaliation

In accordance with the **Public Interest Disclosure Act 1998**, individuals who raise genuine concerns in the public interest are legally protected from dismissal, demotion, victimisation, or any form of detriment.

Retaliation against a whistleblower will result in disciplinary action, which may include dismissal.

8. Investigation Process

- All concerns will be acknowledged promptly and assessed fairly.
- If a full investigation is required, it will be conducted impartially and confidentially by a designated Manager or external party if needed.
- The whistleblower will be kept informed of progress and outcomes, where appropriate and legally permissible.
- Records will be kept in accordance with data protection legislation (UK GDPR and DPA 2018).

9. Malicious or False Allegations

We ask that concerns are raised in good faith. Deliberate false or malicious allegations may result in disciplinary action, although individuals will never be penalised for raising a concern that turns out to be unfounded if made sincerely.



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10. Review and Training

This policy will be:

- Reviewed annually, or in response to changes in Scottish legislation or company operations.
- Communicated to all staff via induction.

R DUNCAN

Managing Director

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