



# Whistle Blowing Policy

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**Issue Date:** 10/10/2025 **Issue:** 4

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The Public Interest Disclosure Act 1998 protects employees who 'blow the whistle' about any wrongdoing from being subjected to any behaviour or treatment considered to be to their detriment as a result. It makes provision about the kinds of disclosure which may be protected, the circumstances in which such disclosures are protected, and the persons who may be protected.

This policy implements those requirements and is intended to encourage employees to make disclosures about wrongdoing to **East Lancashire Chemical Company**, without fear of reprisal, so that problems can be identified and resolved quickly.

Certain kinds of disclosure qualify for protection. These are disclosures of information which an employee reasonably believes tend to show one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future.

Examples of malpractice or "exceptionally" serious concerns covered by this policy include:

- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- The endangering of an individual's health and safety
- Damage to the environment
- Deliberate concealment of information relating to any of the above

Employees who raise concerns through the agreed whistleblowing procedures will not be subject to disciplinary action, provided that they do so lawfully, without malice, in the public interest, and in a way that respects confidentiality.

Raising a false allegation with malicious, vexatious, or frivolous intent will be regarded as a serious disciplinary offence.

- In the event of an employee wishing to make a qualifying disclosure, you should, in the first instance, speak to your line manager.
- Your line manager will endeavour to deal with your concerns as soon as possible and in any case within five (5) working days from the time the disclosure is first made. If it is not possible to respond within this period, you will be given an explanation for the delay and told when a response can be expected.
- In all cases, you will be informed of the outcome of the investigation and the Company's conclusions. If you do not wish to speak to your line manager, you can instead speak to a Company Director.



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- Alternatively, you can contact our whistleblowing line, which is supported by our HR consultancy partners, Loates, on **01332 890345**.

Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, we must be able to determine the scope of the investigation and the individuals who should be informed of the disclosure. We therefore reserve the right to involve other employees of **East Lancashire Chemical Company** who may be better placed than your line manager to resolve the problem.

The person handling the investigation will determine whether there is any further action to be taken and, on final completion of the investigation, will confirm the outcome to the interested parties. If they consider that a complaint of misconduct is justified, a disciplinary hearing will be arranged in accordance with the Company's Disciplinary Policy and Procedure.

**Robert Fenton**  
**Group Managing Director**  
**10<sup>th</sup> October 2025**