

## Whistleblowing Policy

*This procedure is endorsed by the Company's Board and will be reviewed regularly. This procedure may be changed from time to time and you will be informed of any such changes. This policy is non contractual.*

### INTRODUCTION

Harworth Group supports the highest standards in corporate governance. Our aim is to promote good governance by assuring our employees of our commitment to quality, openness, accountability and integrity.

As part of our commitment to these high standards, this statement is intended to support and encourage employees or others with serious concerns or information, relating to questionable practices, to do the right thing and come forward and express those concerns. We recognise that employees may need to come forward on a confidential basis. We want to make it clear that they can do so without fear of victimisation.

The purpose of introducing this Whistleblowing Policy is to encourage employees to raise any serious concerns by "blowing the whistle" within the Company, rather than disregarding a problem or raising the issue externally. The policy is not intended to be used for the pursuance of grievances about a personal situation, as the Company already has policies and procedures in place for this purpose.

### CONFIDENTIAL REPORTING

Harworth Group understands that it is never easy for an employee to report their concern, particularly one which may relate to corruption, dishonesty, health and safety or environmental issues. Employees are urged to come forward with any concerns at the earliest opportunity to prevent any situation from worsening. Any concerns should be raised with the HR Manager.

An employee can at all times take the opportunity to be accompanied by a colleague or trade union representative, if they so wish.

Harworth Group will support all employees who report a concern, and protect them from retribution or victimisation. If an employee reports their concerns, in good faith, they can be confident that this will not affect their career or their current job situation, even if the concern later turns out not to be justified.

All matters reported will be treated in a confidential manner. If a situation arises where information has to be disclosed to a third party, e.g. the police, this will be discussed with the person(s) who originally reported the matter to establish how the Company can proceed. Anyone who is found to threaten or use physical violence will be reported to the police.

Any employee who uses this policy to make malicious accusations, which they know to be untrue, will be subject to disciplinary action. Similarly, if anyone tries to deter, intimidate or victimise an employee to prevent them from coming forward with their concerns or after they have reported their concerns, we will treat this as a serious matter and disciplinary action will be taken.

The Public Interest Disclosure Act 1998 (which came into force in January 1999) was enacted to enable employees to raise their concerns. It gives legal protection to those who honestly and reasonably believe that the information they disclose or the allegations they make are substantially true. In addition, The Company's (Audit, Investigations and Community Enterprise) Act 2004 (effective from April 2005) introduced key changes in respect of the disclosure of information by directors and employees to company auditors. Employees are encouraged to consult the confidential fraud line if they are concerned about the accuracy or scope of information provided to auditors by themselves or by a co-worker.



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If you wish to raise any concerns that you may have, you can write or speak to the HR Manager. If your concern is about the Finance Director or Chief Executive, or if you believe that the issue can only be addressed by the Board of Directors you should speak to the Chairman or Company Secretary both of whom will also brief the Senior Independent Director on any issues raised.

### THE DIRECTORS STATEMENT

Any employee who comes forward with a concern, in good faith, whether this concern is later found not to be justified, will receive support and protection from victimisation.

Any concerns reported to the Company will be thoroughly, carefully and fairly investigated by management, External Auditors or through the disciplinary process. If appropriate, matters will be referred to the police or other external agency. As part of our investigations, we will consider any doubts or misgivings you may have about confidentiality and your own safety or career.

The Company will take appropriate steps to minimise the difficulties that you may experience as a result of using the Whistleblowing Policy.

### Monitoring the policy

Confidential records will be maintained of all matters raised through the Whistleblowing Policy and a report will be presented to the Audit Committee with individual names withheld if requested. Continual assessment of the effectiveness of the policy and any emerging patterns will be undertaken.

### Contact Details

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