



Whistleblowing Policy

Code: POL/10

1. Introduction

1.1 This document details the Company Policy on whistleblowing.

1.2 Whistleblowing encourages and enables employees to raise serious concerns within the organisation rather than overlooking a problem or 'blowing the whistle' outside.

1.3 The Company referred to throughout this document as Ede's is legally registered as Ede's (UK) Limited.

2. Policy Statement

2.1 This policy sets out what happens when an employee may wish to make a protected disclosure and the process to follow.

2.2 Under the Public Interest Disclosure Act 1998 (PIDA), the Employment Rights Act 1996, the Bribery Act 2010 and the Enterprise and Regulatory Reform Act 2013 protection is offered against victimisation or dismissal for workers who report (blow the whistle) on criminal behaviour or other misconduct within an organisation either to the Company or another recognised or regulatory body.

3. Scope

3.1 This policy applies to all Colleagues of the Company Ede's in all entities, regardless of seniority or site. It also extends to anyone working for or on the Company's behalf e.g., those engaged by the Company on a self-employed basis or an agency arrangement. Where reference is made to UK legislation it is expected the equivalent local legislation to be followed in other jurisdictions.

3.2 The application of this policy includes where the Company's business involves the use of third parties e.g., suppliers; contractors. The Company choose to do business with organisations which have an equal commitment to ethical business. Conversely, Ede's will not do business with those who lack such a commitment.

4. Protected Disclosures

4.1 General examples of matters which may lead an employee to make a protected disclosure including situations where an employee may suspect or be aware of the following:

- A criminal offence has been committed, is being committed or is likely to be committed.

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- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject.
- A miscarriage of justice has occurred, is occurring or is likely to occur.
- The health and safety of any individual has been, is being or is likely to be endangered.
- The environment has been, is being or is likely to be damaged.
- Deliberate attempt to conceal any of the above.

5. Qualifying Conditions

5.1 The employee must make the disclosure in the reasonable belief that it is in the public interest.

5.2 Employees are protected by employment law, so if the worker are dismissed because of whistleblowing, they may claim unfair dismissal.

6. Whistleblowing Procedure

6.1 If an employee has a concern which may constitute a protected disclosure as defined in section 4, the following procedure should be followed:

- 6.1.1 In the first instance any concerns should be raised in writing with the employee line manager.
- 6.1.2 If the employee is unable to raise the concern with their line manager, then this should be raised in writing with a senior manager.
- 6.1.3 Concerns raised will be treated with the utmost confidentiality and will be fully investigated. The employee will be advised of the outcome of the investigation.
- 6.1.4 Employees should be reassured that there will not be any harassment, victimisation, or any other detriment for reporting such actions either from the Company or their colleagues. If a worker experiences or has a genuine fear of reprisals, these should be raised with the Company or with the relevant regulator. The Company will take all reasonable steps to prevent such behaviour.
- 6.1.5 Employees who have concerns or complaints regarding their employment or employment matters which are not in the public interest may raise these issues through the Company Grievance Procedure set out in the Ede's Employee Handbook.
- 6.1.6 Employees who subject colleagues (who have made whistleblowing disclosures) to bullying, harassment or some other detriment will be subject to the disciplinary action up to and including dismissal.
- 6.1.7 If any disclosure concerns information which the employee does not substantially believe is true or is made in bad faith (for instance, to cause disruption within the Company), or indeed if the disclosure is made for personal gain, then they may become subject to action under the Disciplinary Procedure, which could include dismissal.

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7. Policy Monitoring

7.1 This policy is not intended to be contractual and can be amended or withdrawn at any time.

7.2 This policy supersedes any previous agreements and/or documents previously communicated.

7.3 The policy will be monitored to confirm that the above arrangements are being adhered to in all areas.

8. Change Control

Version No	Page No	Date	Brief detail of changes
1		05/03/2024	Document created. Replaces historical Public Interest Disclosure (Whistleblowing) Policy (POL10).

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