



Ixion Group Policy & Procedure

Whistleblowing



Policy Statement

As an organisation that utilises public monies and operates to high standards of integrity, the Ixion Group (Ixion) takes all allegations of malpractice very seriously. We aim to foster an environment in which employees feel able to raise genuine concerns without fear of reprisal. Ixion is committed to maintaining an honest, fair and open culture with the highest standards of honesty and accountability.

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, subcontractors, trainees and those on work experience placements with Ixion (referred to collectively as 'employee' in this policy).

It is the duty of all employees to alert management to any suspected or actual malpractice immediately it is identified, enabling the Company to take prompt and appropriate action to investigate and address these concerns and maintain the integrity of our business.

The Public Interest Disclosure Act 1998 provides a framework of protection against victimisation for workers who blow the whistle on criminal behaviour or other wrongdoing in line with this Act. Any employee raising a genuine whistleblowing concern under this policy will not be at risk of losing their job or suffering any adverse consequences for their future employment or career. Employees will also be afforded protection should they be bullied or suffer harassment from their colleagues as a result of raising a concern.

Communication

All staff will be made aware of this policy and associated procedures as part of their staff induction, and any refresher training delivered during business as usual. It is available to all employees within the Ixion Cloud system. Any member of staff raising a whistleblowing concern will receive a copy of the latest policy document for reference.

Associated Policies

This Policy and associated procedures should be read in conjunction with the following Policies:

- Grievance
- Discipline & Dismissal

Definitions

A whistleblowing concern is where an employee has a concern about a danger or illegality in the workplace that has a public interest to it, and which includes one or more of the following:



- A criminal offence
- Fraud and Irregularity
- A failure to comply with a legal or contractual obligation or regulatory requirements
- 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.

A grievance or complaint that is not covered by one of the above definitions, or a dispute about the employee's own employment position which has no public interest dimension, should be raised as a grievance and is not covered by the Whistleblowing Policy.

From June 2013 legislation was revised to state that a whistleblower must believe that their disclosure is in the public interest and not for their own personal interest. In order to be protected by the law employees must:

1. have made the disclosure in good faith
2. reasonably believe that the information is substantially true
3. not make the disclosure for personal gain
4. ensure it is reasonable to make the disclosure – it is of a sufficiently serious nature and is something that is continuing or likely to occur in the future; it is disclosed to the right person; whether a duty of confidentiality to other parties would be breached

Concerns raised with good intention which turn out to be unfounded are considered an essential product of an effective culture for raising concerns. However, unfounded concerns raised solely with malicious intent are not acceptable and will be dealt with in accordance with the Company Disciplinary & Dismissal Policy.

Whistleblowing Procedure

Reporting a Concern

Ixion has a staged reporting process:

1. If an employee has a concern about malpractice, they should raise the concern first with their Line Manager. This may be done orally or in writing.
2. If they feel unable to raise the matter with their Line Manager e.g. the Line Manager is implicated in the concern, contact the Group Finance and Corporate Services Director (Rachael White 01245 505632) or the Head of Service HR (Janet Young 01245 505634) either orally or in writing.
3. If an employee has followed the actions above and still has concerns, or they feel that the matter is so serious that they cannot discuss it with any of the above, they should contact the CEO in writing.



4. If an employee has tried all of the actions above, or doesn't feel any of them is appropriate (for example the concern may be about one of the individuals named), then they should raise the matter with a Non Executive Board Member who has been nominated as an independent external person to whom such concerns can be referred in writing and confidentially outside line management if necessary. Write to:

Peter Baynham
Chair of Audit and Compliance Committee / Ixion Board Member
Halford House 2nd Floor
Chelmsford
Essex
CM1 1TD

Mark correspondence – 'Strictly Confidential – Non Executive Board only'

Investigation

Anyone notified of a concern must:

- ensure that concerns are taken seriously, treated sensitively and without undue delay
- investigate properly noting relevant details/collecting any documentary evidence before making an objective assessment of the concern
- keep the employee advised of progress and outcome
- ensure that the action necessary to resolve a concern is taken.

Once a concern has been raised, Ixion is committed to investigating the concern fully to assess what action should be taken. This may involve an internal enquiry or a more formal investigation. Complaints will be investigated by a manager who is at least one level senior to the employee, or if alleged malpractice involves a senior manager, the CEO and/or Chair of the Audit and Compliance Committee. Employees will be advised who is handling the matter, how they can make contact and whether further assistance may be required. On request, Ixion will write to the individual summarising their concern and outlining how the Company proposes to handle it.

The investigator will conduct an investigation to establish the facts, in order to arrive at a view of whether the malpractice has occurred, or is likely to occur and what (if any) action should be taken. This may include interviewing other employees, contractors or other individuals.

The investigator will report back to the senior management team on the outcome of the investigation and recommendation for action. If the investigation reveals circumstances in which disciplinary action against an individual employee is appropriate, that individual's line manager (in consultation with the Head of Services HR) will take the necessary steps under the Disciplinary & Dismissal procedure. In some circumstances the police or other external authorities may need to be alerted.

Full details of allegations, investigation and the outcome of the investigation will be retained securely by the Group Finance and Corporate Services Director.



While the purpose of this policy is to enable Ixion to investigate possible malpractice and take steps to deal with it, we are committed to providing as much feedback to the individual raising the concern as possible. Please note however, that in certain instances it may not be possible to inform the complainant of the precise action being taken where this would infringe a duty of confidence owed by Ixion to someone else.

Anonymity & Confidentiality

While Ixion will consider anonymous whistleblowing concerns seriously they can be more difficult to investigate. It may be difficult for us to meet some of the assurances in this policy if we do not know identity of the individual raising the issue as it may impede any investigation.

If an employee has raised a concern and has requested that they remain anonymous, this request will be honoured as far as possible. However, a situation may arise where we are not able to resolve the concern without revealing their identity e.g. because evidence is required in court. Should this issue arise we will discuss the situation with the individual and agree how to proceed.

When people choose to be anonymous (for whatever reason) they may also shares concerns with another Ixion employee that is not either the CEO/FD/Chairman or Chairman of the Audit & Compliance Committee. The person who was confided in has a duty to disclose any concern of malpractice as per this Whistleblowing Policy. This may be through:

- encouraging and supporting the employee to report their concerns to the right individuals in the organisation responsible for compliance who will provide relevant protection, and then removing themselves from the process; or
- taking on the roles as a whistleblower and raising the concern in line with this policy, where they believe it to be true.

All employees have a duty to disclose any suspected or actual malpractice immediately it is identified where it meets the definitions in this policy. It is not appropriate for employees to engage in gossip, speculation, malicious rumour mongering or other negative communication with colleagues or third parties in relation to activities which should be dealt with through this policy – any such inappropriate behaviour, particularly resulting in reputational risk to the Company, may be dealt with via the Disciplinary & Dismissal Policy.

Follow Up

If a member of staff is dissatisfied with how a whistleblowing complaint has been handled, they should refer to Ixion's Grievance Policy.

Whilst the Company cannot guarantee that we will respond to all matters in the way a complainant might wish, we will endeavour in all instances to handle the matter fairly and properly. By adhering to this policy, employees will help us to achieve this.



Responsibilities

While all staff have a responsibility to uphold the commitments in this policy and to raise concerns described herein, specific responsibilities are as follows:

- Chief Executive – responsible for ensuring that all concerns raised are dealt with fairly, thoroughly and in accordance with the policy.
- Group Finance and Corporate Services Director – responsible for maintaining records of reports, investigations and outcomes and leading continuous improvement of company practices as a result of this activity.
- Managers – responsible for ensuring that staff are aware of the policy and its application, and for creating an environment in which staff are able to express concerns freely and without fear of reprisal.

Monitoring & Review

The Group Finance and Corporate Services Director will monitor the process and outcomes of individual reports to assess how effectively this policy is implemented – this may include meeting with complainants to discuss their views on how well the process worked and how it may be improved.

The Group Finance and Corporate Services Director will report back to the Board on the effectiveness of the policy and whether any changes are needed.

This policy will be reviewed annually by the Audit and Compliance Committee to ensure that it continues to meet current legislative requirements, adopts emerging best practice, and continues to be effective and relevant to the wider business.