



Bader Malan Limited
Neville House, 17 Richmond Close, Bookham Nr. Leatherhead
Surrey KT22 9NX
Email: Info@badermalan.co.uk
Company Registration Number 4329913

1. Purpose

This policy aims to provide a clear framework for employees, contractors, and other stakeholders to report any concerns about wrongdoing, unethical behaviour, or breaches of legal obligations within the company. The policy ensures that whistleblowers can make such reports in good faith without fear of retaliation or detriment.

2. Scope

This policy applies to all employees, contractors, suppliers, consultants, and any other third parties associated with Bader Malan Ltd. It covers all types of misconduct, including:

- Criminal offenses (e.g., fraud, bribery, corruption)
- Breach of legal or regulatory obligations
- Health and safety risks
- Environmental damage
- Miscarriage of justice
- Financial malpractice
- Any other unethical conduct

3. Reporting Procedure

If you have a reasonable belief that any misconduct or wrongdoing has occurred, is occurring, or is likely to occur, you are encouraged to report your concerns as soon as possible. Concerns can be reported using one of the following methods:

1. **Line Manager:** You are encouraged to first report your concern to your immediate line manager. If this is not appropriate or you feel uncomfortable doing so, you may choose one of the alternatives below.
2. **Whistleblower Officer:** Reports can be made directly to the designated Whistleblower Officer at louise@badermalan.co.uk.
3. **Anonymous Reporting:** Reports can also be made anonymously through the FCA.

4. Confidentiality and Anonymity

All concerns raised under this policy will be treated in strict confidence. The identity of the whistleblower will be kept confidential to the fullest extent possible, consistent with the need to conduct a thorough investigation.

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Anonymous reports are also accepted, but it may be more difficult to fully investigate the concerns raised if further information is needed.

5. Protection Against Retaliation

Bader Malan Ltd is committed to ensuring that no one suffers any detrimental treatment as a result of reporting a concern in good faith. Detrimental treatment includes, but is not limited to:

- Dismissal or disciplinary action
- Demotion or withholding of promotions
- Harassment or bullying
- Discrimination
- Any other form of retaliation

Any employee or third party found to have retaliated against a whistleblower will face disciplinary action, up to and including dismissal or termination of the contract.

6. Investigation Process

Upon receiving a report, the company will:

1. Acknowledge receipt of the concern within 2 working days.
2. Conduct a preliminary assessment to determine if a full investigation is warranted.
3. If warranted, a full investigation will be carried out by the appropriate person or team, which may include internal staff, external investigators, or legal advisers.
4. Whistleblowers will be informed of the outcome of the investigation, to the extent appropriate, taking into consideration any confidentiality or data protection considerations.

7. False Reporting

Deliberately making a false or malicious report under this policy is considered a serious disciplinary offense and will be dealt with accordingly. However, if a report is made in good faith but is not substantiated, no action will be taken against the whistleblower.

8. Monitoring and Review

This policy will be reviewed annually, or sooner if required by changes in legislation or circumstances, to ensure it remains effective and aligned with best practices.

9. Contact Information

- **Whistleblower Officer:** Louise Nelligan
- **Confidential Hotline:** 01372 439355

10. Governing Law

This policy shall be governed by and construed in accordance with the laws of England and Wales.

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Approval and Implementation

This policy is approved by the Board of Directors and is effective as of 14th August 2024.