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1.0 OBJECTIVES

We are committed to carrying out our business in a safe, honest and ethical way. Part of that is creating an open and supportive working environment where colleagues feel able to speak up about any suspected wrongdoing or to raise any concerns. This Policy details our process for dealing with whistleblowing and protected disclosures.

2.0 QUALIFYING DISCLOSURES (PROTECTED DISCLOSURES)

A protected disclosure is any disclosure of information which, in the reasonable belief of the individual making the disclosure, tends to show one or more of the following:

- (1) that a criminal offence has been committed, is being committed or is likely to be committed;
- (2) that a person has failed, is failing or is likely to fail to comply with any legal obligation(s);
- (3) that a miscarriage of justice has occurred, is occurring or is likely to occur;
- (4) that the Health & Safety of an individual has been, is being or is likely to be endangered;
- (5) that the environment has been, is being or is likely to be damaged;
- (6) breach of any internal procedure/policy; or
- (7) Deliberate concealment of any of the above.

The Public Interest Disclosure Act 1998 (Act) gives employees, directors, consultants, contractors, agency staff and other workers the right to protection from their employer against any detriment or disadvantage made against them as a result of reporting or making a 'protected disclosure' (i.e. Whistleblowing) about alleged wrongdoing or malpractice. The Company undertakes to satisfy the objectives and intentions of the Act (including any other associated or equivalent legislation or regulation) and will ensure that no individual who makes a protected disclosure will be disadvantaged.

Disclosure only qualifies for protection when it concerns information regarding any of the above and only provided that in making the disclosure the individual does not themselves commit a criminal offence.

It is a condition of employment that employees of the Company accept the need for complete confidentiality, as outlined in individual contracts of employment. *The Act does not create a general right for Workers to disclose confidential information.*

In general, the disclosure must be made in the reasonable belief that it is in the public interest, is substantially true and is not made for personal gain. This is to ensure that, where practicable, Individuals initially raise their concerns through appropriate channels rather than publicly disclosing the matter.

The Company aims to encourage openness and will support individuals who raise genuine concerns under this policy. All other employees, directors, consultants, contractors, agency staff or workers must not threaten or retaliate

against Whistle-blowers in any way. Such conduct will be subject to disciplinary action and in some cases the Whistle-blower could have the right to sue the person who makes the threat or who retaliates for compensation.

3.0 CONCERNS THAT FALL OUTSIDE THE DEFINITION OF A QUALIFYING DISCLOSURE

If an individual has a genuine concern that does not fall within the definition of a qualifying disclosure the company will determine whether the whistleblowing or grievance procedure will be followed.

The company takes any form of malpractice very seriously and this procedure is to enable individuals to raise concerns at an early stage and in the appropriate way. It is important that any individual can raise the matter when it is just a concern, rather than waiting for proof or for the problem to get worse.

4.0 COMPANY PROCEDURE

Internal Reporting

You should report any concerns you may have to by emailing whistleblowing@lodgeservice.com or phoning the whistleblowing line and leaving a message on 01285 703935 alternatively you may contact your line manager or HR who will treat the matter with complete confidence.

When raising your concern, please provide details of your concern, why you think it's true and any other details you can give us. Remember to include your contact details. We may need to get in touch to talk about your concerns or to get some more details.

You can raise your concerns anonymously if you like and we'll take these seriously. But it may be difficult for us to do a proper investigation if we can't talk to you about other information we might need.

All concerns will be investigated through the company investigation procedure, with a relevant and independent manager appointed to complete the investigation.

External Reporting

We'd really like you to raise any concerns internally first, to give us the chance to look into things. But you do have the option of reporting the matter to the Relevant Authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- SIA
- the Financial Services Authority;
- the Office of Fair Trading;
- the Health and Safety Executive; and
- the Environment Agency;

5.0 Outcome

Depending on the nature of disclosure, we may not be able to tell you about any investigation we do or action we take about the issue you've told us about. But wherever we can, we'll try to let you know the outcome. We trust that you'll treat any information we do give you as confidential.