

2025

KMP 021 Whistle Blowing Policy



GroupHorizon
LIGHTING UP YOUR FUTURE

Policies and Procedures

WHISTLE BLOWING POLICY

Introduction

Group Horizon Ltd are committed to conducting their business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect all Group Horizon Ltd directors, employees and anyone acting on our behalf to do the same and to maintain the highest standards of ethical business behaviour. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

A key aspect of ensuring and maintaining Group Horizon Ltd commitment to conducting business with such integrity and in an open and fair manner is providing a robust whistleblowing policy and reporting channel for Group Horizon Ltd so that all colleagues feel able to report any wrongdoing in confidence. At Group Horizon Ltd we encourage employees to report any concerns as soon as they arise; such concerns can be of any nature, including any matters in connection with Group Horizon Ltd personnel, as well as customers, suppliers and other third parties.

The aim of this policy therefore is to:

- Encourage and empower colleagues to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide colleagues with guidance as to how to raise those concerns.
- Reassure colleagues that they will be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- Encourage a culture of openness.
- Ensure compliance for Group Horizon Ltd with the relevant legislation.

This is not a policy to be used in order to question Group Horizon Ltd financial decisions or business strategy, nor should it be used to raise matters which would normally be considered under an HR grievance procedure (for example harassment, bullying or discrimination) or are already the subject of a disciplinary procedure. The below sets out in more detail what type of behaviour this policy covers and what should be reported pursuant to this policy.

Scope

This policy applies to all Group Horizon Ltd entities and personnel (including directors, executives, officers, employees, contractors, agency workers, casual workers, consultants, and trainees) no matter which team they work in or which office. It relates to actions by such personnel as well as any concerns a colleague may have with one of Group Horizon Ltd customers, suppliers or any other third parties with which Group Horizon Ltd interacts or does business.

Training and Awareness

Group Horizon Ltd is committed to ensuring that all staff are aware of this Whistle Blowing Policy and understand how to raise a concern. To support this:

All staff are introduced to whistleblowing procedures as part of their induction training.

Line managers and safeguarding leads receive enhanced training on handling disclosures and understanding legal obligations under the Public Interest Disclosure Act 1998.

Refresher training and CPD is provided at least every 3 years or when legislation or internal procedures change.

Staff are regularly reminded of their rights, and how to access whistleblowing support and reporting routes in a confidential and safe manner.

What Type of Misconduct Should Be Reported?

As noted above, Group Horizon Ltd wants to hear about such conduct that is unlawful, dishonest, or unethical as soon as possible and is committed to addressing it. The below provides examples of the types of misconduct or behaviour that could give rise to a report; however, it is not an exhaustive list and Group Horizon Ltd encourages all colleagues to report any behaviour or incidents which they have concerns about.

- Criminal activity or offences, including fraud, theft, and embezzlement.
- Corruption, bribery, or extortion.
- Financial malpractice, impropriety, or mismanagement.
- Facilitating tax evasion.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Conduct likely to damage Group Horizon Ltd reputation or financial wellbeing.
- Actions which endanger the health and safety of Group Horizon Ltd personnel or the public.
- Actions which cause damage to the environment.
- The deliberate provision of false information to public officers.
- An injustice.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of information relating to any of the above matters.
- Any retaliation against someone for speaking up or “whistleblowing.”

Everyone has a responsibility to report any such misconduct or potential misconduct as soon as they become aware of it. If you are uncertain whether something is within scope of this policy, it is preferable that any concerns are reported rather than kept to oneself.

How to Report A Concern - All Colleagues

All of the options below include escalation to members of staff who are fully trained in whistleblowing reporting and procedures. Irrespective of the option exercised therefore, the whistleblowing procedures Group Horizon Ltd has in place ensure that you will be taken through and will fully understand the overall process and next steps.

Option 1 – Line Manager Any reports should be made to your line manager in the first instance for further investigation. This may be done either verbally or in writing. Your concern may be escalated to appropriate parties, on the condition that your concern does not implicate such parties. A decision will then be taken as to who is best placed to investigate and resolve the matter.

Option 2 – Appropriate Parties If the option of reporting to your line manager is not feasible, is inappropriate or you feel uncomfortable in doing so for any reason (including if you have concerns about their involvement), or the response received is unsatisfactory, you can report the concern directly to an appropriate party for further investigation. A decision will then be taken as to who is best placed to investigate and resolve the matter.

What Will Group Horizon Ltd Do About Concerns That Are Raised?

Once you have raised a concern, the person to whom you raised the concern will inform the respective senior management, as outlined above, and a decision will be taken as to who is best placed to investigate the matter.

Depending on the report concerned, the CEO may also be informed as part of this process. We will endeavour to keep you informed of the progress of the investigation. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. If we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower will be subject to disciplinary action.

Reporting Concerns Externally – Exception Cases Only

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. However, Group Horizon Ltd recognises that there may be circumstances where staff may feel they wish to report matters to outside bodies such as a regulator or the police. It will very rarely be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline.

They also have a list of prescribed regulators for reporting certain types of concern. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out above for guidance.

Protection Against Retaliation

'The Public Interest Disclosure Act 1998, shortened to PIDA, is the law that protects whistle-blowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996 (ERA).

PIDA makes it unlawful to subject a worker to negative treatment or to dismiss them because they have raised a whistleblowing concern. Raising a whistleblowing concern is also known as a making a 'protected disclosure' in law.

Whistleblowing rights under PIDA are day one rights. This means that the worker does not need the same two years' service that is needed for other employment rights.'

Group Horizon Ltd will ensure that genuine concerns raised of a reasonable belief can be raised without fear of retaliation and will not affect the continued employment, work, or career with

Group Horizon Ltd of the person who raised their concerns. Group Horizon Ltd will not tolerate harassment, victimisation, or retaliation towards any person for raising concerns on the basis of a reasonable belief or objecting or refusing to participate in any act or practice that they honestly believe to be in violation of law or misconduct.

Any such harassment, victimisation or retaliation will be treated as profoundly serious and will be a disciplinary offence in accordance with Group Horizon Ltd procedures.

Confidential and Anonymous Reporting

All reports will be handled in complete confidence and the identity of the individual reporting the issue will be kept confidential and only disclosed to those who need to know it for purposes of any investigation. Please note that it is more difficult for an issue to be investigated, to protect the individual reporting the issue or to give them feedback, if the individual cannot be identified.

An investigation stands a much greater chance of success if the person who raised the concern remains in communication via the Safecall portal or by telephone. Even if they choose to remain anonymous, it is still possible and desirable to establish a channel of communication.

Reports

A report of all disclosures made under this procedure, and any subsequent action taken, will be prepared by the designated officer who will retain such reports for a period of three years. In all cases, a report of the outcomes of any investigation will be made to the Board.

Appeals

An individual against whom action is proposed, following an investigation under this public interest disclosure procedure, and who wishes to appeal against such action, may submit an appeal unless the staff or student disciplinary procedure is to be involved (which themselves provide for appeals). Any appeal must be submitted in writing within 14 days to the Managing Director.