

Modern Slavery Act Whistleblowing Policy

Date: November 2023 | Review Date: November 2024

Introduction - The Modern Slavery Act

In 2015, The UK Modern Slavery Act came into effect. This means that companies with a turnover of £36 million or more are required to produce an annual slavery and human trafficking statement. In large corporations, modern slavery could be present in supply chains without the knowledge of the company. In a bid to help eradicate modern slavery forever, we now have strict supplier auditing processes in place, as well as due diligence procedures, both of which can be found in our Slavery and Human Trafficking Statement (56000-06). In order to

ensure all our employees feel comfortable raising any concerns they have regarding slavery in our supply chains, we have created a detailed whistleblowing policy. We hope that the policy will be read by all staff and referred to should any concerns regarding slavery in the workplace or supply chains arise. Should you have any questions or require clarification regarding our whistleblowing policy, feel free to speak to Stuart Robertson.

Purpose and Scope

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice.

Oxford Safety Supplies Ltd takes malpractice very seriously. We encourage open communication from our employees. We want you to feel secure about raising your concerns. All staff have statutory protection if they raise concerns regarding Modern Slavery in the right way. This policy is designed to give staff that opportunity and protection.

It does not matter if you are mistaken. You do not have to prove anything about the allegation you are making but you must reasonably believe the information you have tends to show some malpractice. This policy applies to employees, contractors and other workers within Oxford Safety Supplies Ltd, including agency workers and those who work from home.

When to use this Policy

There is a difference between whistleblowing and raising a grievance:

- Whistleblowing is where you have a concern about a danger or illegality that has a public interest aspect to it (e.g. because it threatens clients, third parties or the public).
- A grievance or complaint generally relates to your own employment position and does not have an additional public interest dimension.

This policy is not the procedure for general grievances. If you have a complaint about your own personal circumstances, you should use the normal grievance procedure.

Concerns Covered by this Policy

The concerns covered by this policy are:

- That a criminal offence has been, is being or is likely to be committed;
- That someone within our supply chain is being subjected to a form of modern slavery;
- Danger to the health and safety of any individual;
- Damage to the environment;
- Deliberate concealment of any of the above;

Our Guarantee

Oxford Safety Supplies Ltd is committed to this policy.

If you use this policy to raise a concern, we give you our assurance that you will not suffer any form of retribution or detrimental treatment. We will treat your concern seriously and act according to this whistleblowing policy. If you ask for a matter to be treated in confidence, we will respect your request and only make disclosures to third parties, directors, or other staff with your consent. This assurance applies regardless of whether the subject matter of your concern, report or disclosure relates to this company, a client or third party.

Procedure for Raising Concerns under this Policy

If you are concerned about any form of malpractice covered by this policy, you should normally first raise the issue with your immediate supervisor. If, for whatever reason, you feel you cannot tell your immediate supervisor, you should raise the issue with the Stuart Robertson. If he is unavailable, you should discuss your concerns with Barry Robertson.

Concerns can be raised orally or in writing. When raising the concern, you may choose to either include your identity or remain anonymous. You may wish to discuss your concern with a colleague before you formally raise it under this policy. However, remember that once you have raised your concern (alone or with your colleague), in the interests of everyone involved, this is a confidential process.

Responding to Concerns Raised

After an employee has raised a concern, we will record that concern in our central Whistleblowing Report Register which is maintained by Stuart Robertson.

We will then decide how to respond in a responsible and appropriate manner under this policy. This will usually involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage. This may be formal or informal, depending on the nature of the concern raised. We will

endeavour to complete investigations within a reasonable time. We will keep you informed of the progress of the investigation carried out and when it is completed. Please note that we will not be able to inform you of any matters that would infringe the duty of confidentiality owed to others.

Raising your Concern Externally (Exceptional Cases)

The purpose of this policy is to give staff the opportunity and protection they need to raise concerns internally. We expect that in almost all cases, raising concerns internally would be the most appropriate action for you to take.

Regulatory Disclosures

If, for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, you can consider raising the matter with an external body. A list of all the bodies currently listed as regulators for the purpose of raising your concerns and the areas they are responsible for is available from the Department for Business Innovation and Skills.

Wider Disclosures

If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making a wider disclosure, e.g. by reporting the matter to the police or to the media.

Caution: whistle-blowers who make wider disclosures of this type will only be protected in certain circumstances (such as from dismissal or suffering detrimental treatment). Oxford Safety Supplies Ltd recommends that employees take independent legal advice before following this course of action.

Respecting Supplier Confidentiality

When making external disclosures, you should be aware of your obligation to keep the affairs of a supplier confidential unless:

- Disclosure is required or permitted by law; or
- The supplier consents.

The whistle-blower should only divulge relevant information regarding a potential breach of The Act to the appropriate staff member. Defaming a supplier without undergoing the correct procedure could needlessly defame a supplier.

Consequences of Breaching this Policy

Those using the procedure outlined in this policy to raise a concern are assured that they will not suffer any form of retribution or detrimental treatment. Any person who victimizes a bona fide whistle-blower will be liable to disciplinary action. To ensure the protection of all our employees, those who maliciously make a false allegation will be liable to disciplinary action.

Further Information

If you have any questions about the application of this policy, please contact Stuart Robertson.

Public Concern at Work is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. It is a source of further information and advice at www.pcaw.co.uk. (Public Concern at Work provides a free helpline, offering confidential advice on 020 7404 6609).

Monitoring and Review

Oxford Safety Supplies Ltd will regularly monitor the effectiveness of this policy at least annually to ensure it is working in practice. We will provide information and/or training on any changes that are made.

Signed:



Name: Stuart Robertson
Position: Director

Dated: 06/11/2023
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