



Whistleblowing Policy Statement

Introduced: July 2023

Next review date: July 2025

1.0 Introduction

1.1 We Are Ease Ltd (referred to as Ease in this policy) is committed to operating in an ethical and principled way. The aim of this policy and procedure is to provide workers with information about how to raise genuine concerns of suspected bribery, breaches of the law and other serious wrongdoings.

1.2 Ease encourages workers to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. This policy and procedure is intended to provide safeguards to enable members of staff to raise genuine concerns about malpractice in connection with Ease without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy and procedure also seeks to balance the need to allow a culture of openness against the need to protect other workers against vexatious allegations or allegations which are not well-founded.

1.4 The principles of openness and accountability which underpin legislation protecting whistleblowers are reflected in this policy and procedure. Ease is also committed to ensuring compliance with the Bribery Act 2010 (for more details read the Ease AntiBribery Policy).

2.0 Applicability of this Policy and Procedure

2.1 This policy applies to all employees, workers, consultants, contractors and agency workers. In this policy a reference to 'worker' will be made which includes all people who work for or carry out work on behalf of Ease.

2.2 Any worker who is unsure about whether to raise their concern under this policy or as a personal grievance under Ease's Grievance Procedure is encouraged to approach an Ease Director in confidence for advice.

3.0 Protected Disclosures

3.1 The law protects employees who, out of a sense of public duty, want to reveal suspected wrongdoing or malpractice.

3.2 The law allows employees to raise what it defines as a 'protected disclosure'. In order to be a protected disclosure, a disclosure must relate to a specific subject matter (See Section 4 below) and the disclosure must also be made in an appropriate way (See Section 5).

A 'protected disclosure' must, in the reasonable belief of the employee making it, also be made in the



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public interest. A protected disclosure must consist of information and not merely be allegations of suspected malpractice.

4.0 Specific Subject Matter

4.1 If, in the course of employment, a worker becomes aware of information which they reasonably believe tends to show one or more of the following, they must use this policy and procedure:

- That a criminal offence has been committed, is being committed or is likely to be committed;
- That an individual has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;
- That a miscarriage of justice has occurred, is occurring, or is likely to occur;
- That the health or safety of any individual has been, is being, or is likely to be, endangered;
- That the environment, has been, is being, or is likely to be, damaged; or
- That information tending to show any of the above, is being, or is likely to be, deliberately concealed.

5.0 Procedure for Making a Disclosure

5.1 Information which a worker reasonably believes tends to show one or more of the situations given in Section 4 should promptly be disclosed to their Senior Manager so that any appropriate action can be taken.

5.2 If it is inappropriate to make such a disclosure to their Senior Manager, a worker can raise the issue with an Ease Director.

5.3 If the disclosure relates to an Ease Director, a worker can raise the issue with an independent and external Consultant.

5.4 Workers are encouraged to identify themselves when making a disclosure. If an anonymous disclosure is made, Ease will not be in a position to notify the individual making the disclosure of the outcome of action taken by Ease. Anonymity also means that Ease may have difficulty in investigating such a concern. Ease reserves the right to determine whether to apply this procedure in respect of an anonymised disclosure in light of the following considerations:

- The seriousness of the issues raised in the disclosure; and
- How likely it is that the concern can be confirmed from attributable sources.

6.0 Procedure for Investigating a Disclosure

6.1 When a worker makes a disclosure, Ease will acknowledge its receipt, in writing, within a reasonable time i.e., within 5 working days.

6.2 Ease will carry out an initial assessment to determine the scope of any investigation. It will inform the worker of the outcome of its assessment.



6.3 Ease will determine the appropriate action to take (including action under any other applicable Ease policy or procedure). Possible actions could include internal investigation; referral to Ease's auditors; or referral to relevant external bodies such as the police, Health and Safety Executive, Environment Agency, a local authority or the Information Commissioner's Office.

6.4 If appropriate, Ease has designated the Senior Managers as suitable persons to receive whistleblowing concerns. Any of the Senior Managers may be contacted in the first instance and will act as Investigating Officer. If any of the Senior Managers were implicated in the allegation then the matter should be referred to an Ease Director who will act as an Investigating Officer. In some cases Ease may appoint an external investigator or a team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter.

6.5 Any recommendations for further action made by Ease will be addressed to Ease Directors as appropriate in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for not doing so.

6.6 The worker making the disclosure will usually be notified of the outcome of any action taken by Ease under this policy and procedure within a reasonable period of time (usually within 10 working days). However, sometimes the need for confidentiality may prevent Ease giving the employee specific details of the investigation or any disciplinary action taken as a result. Workers should treat any information about the investigation as confidential.

6.7 If the worker is not satisfied that their concern has been appropriately addressed, they can raise it with an Ease Director within 5 working days. The Ease Director will make a final decision on action to be taken and notify the worker making the disclosure.

6.8 There may be circumstances where Ease concludes that the disclosure is without substance or merit or it is not appropriate to carry out further investigations. This might apply where:

- Ease is satisfied that a worker does not have a reasonable belief that suspected malpractice is occurring; or
- The matter is already the subject of legal proceedings or appropriate action by an external body; or
- The matter has already been raised and is being investigated or has been investigated and appropriate action has been taken.

7.0 Safeguards for a Worker Making a Disclosure

7.1 A worker making a disclosure under this procedure can expect their matter to be treated confidentially by Ease and, where applicable, their name will not be disclosed to anyone implicated in the suspected wrongdoing, without their prior approval.

7.2 Ease will take all reasonable steps to ensure that any report of recommendations, or other relevant documentation, produced by Ease does not identify the employee making the disclosure without their written consent, or unless Ease is legally obliged to do so, or for the purposes of seeking legal advice.



7.3 No disciplinary action will be taken against a worker on the grounds of making a disclosure made under this policy or procedure. This does not prevent Ease from bringing disciplinary action against a worker where Ease has a reasonable belief that a disclosure was made maliciously or vexatiously, or where a disclosure is made outside Ease without reasonable grounds.

7.4 A worker will not suffer dismissal or any detrimental action or omission of any type (including informal pressure or any form of victimisation) by Ease for making a disclosure in accordance with this policy and procedure. Equally, where an employee is threatened, bullied, pressurised or victimised by a colleague for making a disclosure, disciplinary action will be taken by Ease against the colleague in question.

8.0 Disclosure to External Bodies

8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases workers should not find it necessary to alert anyone externally.

8.2 The law recognises that in some circumstances it may be appropriate for workers to report concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. Ease strongly encourages workers to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline.

8.3 Workers may make a disclosure to an appropriate external body prescribed by the law. This list of 'prescribed' organisations and bodies can be found in information on the GOV.UK website (<https://www.gov.uk/government/publications/blowing-the-whistlelist-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>)

9.0 Further Assistance for Employees

Under amendments made by section 19 of the Enterprise and Regulatory Reform Act.

9.1 Ease will not tolerate any harassment or victimisation of workers who make disclosures. If, at any stage of this procedure a worker feels that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter, in writing, to an Ease Director. Staff must not threaten or retaliate against whistleblowers in any way and staff that are found to be involved in such conduct may be subject to disciplinary action.

9.2 A worker making a disclosure may want to confidentially request counselling or other support from Ease. Any such request for counselling or support services should be addressed to an Ease Director. Requests will be treated in confidence.

9.3 Workers can also contact the charity Protect (formerly Public Concern at Work) for free and confidential advice on whistleblowing issues.



Contact details are as follows:

Protect Whistleblowing Advice Line

Telephone: 020 3117 2520

Website: www.protect-advice.org.uk

Signed:  Date: 22/6/23 Signed:  Date: 22/6/23 .

Andy Cook, We Are Ease Ltd Director Dafydd Hollyman, We Are Ease Ltd Director



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