

## ***Whistle Blowing Policy***

### **POLICY SUMMARY**

Coffey Group encourages employees to speak up and bring their concerns to light so that problems or issues may be investigated and resolved before any harm occurs.

### **PURPOSE**

This policy is intended to encourage Board members, employees and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution. Occurrence(s) could arise from corruption, bullying/harassment, breaches of safe working practice &/or environmental issues.

### **SCOPE**

The policy applies to all Coffey Group employees equally, to all grades of staff and all types of work. It is a breach of this policy to fail to report a violation or suspected violation that employees know about or to refuse to cooperate with the investigation of a suspected violation.

### **PRACTICE**

This policy creates a safe and confidential environment for employees to report any issues they have concerns about from an alleged improper or illegal perspective in safety.

This policy governs the reporting and investigation of alleged improper or illegal activities as well as the protection afforded to those employees who report them (the “whistle-blowers”).

### **PROCESS**

- The Whistle-blower should promptly report the suspected or actual event to his/her manager and/or anonymously by email to [hsqe@coffeygroup.com](mailto:hsqe@coffeygroup.com)
- If the Whistle-blower would be uncomfortable or otherwise reluctant to report to his/her manager, then they can report the event to the next highest or another level of management, including to an appropriate Director or Board.
- The Whistle-blower can report the event with his/her identity or anonymously.
- The Whistle-blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organisation.
- A Whistle-blower who makes a report that is not done in good faith is subject to discipline (this should link to the company handbook disciplinary procedure), including termination of the Board or employee relationship, or other legal means to protect the reputation of the organisation and members of its Board and staff.
- Anyone who retaliates against the Whistle-blower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
- Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
- Managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
- The Whistle-blower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
- If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistle-blower’s satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.



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- The identity of the Whistle-blower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organisation are subject to subpoena.

### **PROTECTION OF WHISTLE-BLOWER**

The Company will address any alleged complaints of interference, reprisal, retaliation, threats, coercion or intimidation against employees who report, or disclose possible improper or illegal activities.

The Company will protect those who come forward to report such activities in so far as it is possible against retaliation. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and will be subject to disciplinary action.

### **MALICIOUS INTENT**

Where a report is made against another employee and an investigation deems the report to be made out of malicious intent, the employee making the report may be subject to disciplinary action.

Signed: 

Odran Madden

Managing Director Coffey Group

Date: 22/03/2017