

## PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING) POLICY

### Introduction

The Company at all times conducts its business with the highest standards of integrity and honesty. It expects you to maintain the same standards in everything you do. You are therefore encouraged to report any wrongdoing by the Company or its staff that falls short of these principles.

Legislation protects staff who report wrongdoing within the workplace. The Company recognises that you may not always feel comfortable about discussing your concerns internally, especially if you believe that the Company itself is responsible for the wrongdoing. With this in mind, the aims of this policy are:

- to ensure that as far as possible you feel able to inform the Company about any wrongdoing at work which you believe has occurred or is likely to occur;
- to give guidance on what to do if you have concerns about any wrongdoing;
- to reassure staff that they can raise any matter that concerns them with the Company in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.

This policy does not form part of your contract of employment and it may be amended at any time.

### When should you use this policy?

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work, including:

- criminal offences;
- a failure to comply with legal obligations;
- a miscarriage of justice;
- a health and safety danger;
- an environmental risk; or
- a concealment of any of these.

Complaints relating to your personal circumstances (such as how you have been treated at work) should not generally be made under this policy, and should be raised under the Grievance Procedure or the Harassment Procedure as appropriate.

### Procedure

In many cases you should be able to discuss any concerns about wrongdoing with your line manager or the Human Resources Department in the first instance.

However, where the matter is more serious or you prefer not to raise it with them for any reason, you should contact the Non-Executive Director and Audit Committee Chairman, Paul Dollman, who can be reached by email at [whistleblowing@wilmingtonplc.com](mailto:whistleblowing@wilmingtonplc.com).

If the matter requires further investigation, such an investigation will be carried out and you will be informed of the outcome of the investigations and what, if any, action has been taken.

If you remain unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, you should refer the matter to the Chairman, Martin Morgan. When they have investigated your complaint they will tell you the result of the investigation and what, if any, action has been taken.