

Morvern Group Limited

Whistleblowing Policy

1. Purpose

The purpose of this Whistleblowing Policy is to provide a safe and confidential environment for employees and associated individuals to raise concerns about any suspected wrongdoing or malpractice within Morvern Group Limited. This policy ensures that all reported concerns are taken seriously, investigated appropriately, and that individuals raising concerns are protected from retaliation.

2. Scope

This policy applies to all employees, officers, directors, agents, consultants, contractors, and any other third-party representatives of Morvern Group Limited.

3. Policy Statement

Morvern Group Limited is committed to conducting its business with honesty and integrity, and it expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

4. Definitions

- **Whistleblowing:** Reporting suspected or actual wrongdoing, malpractice, or unethical behaviour within the organization.
- **Wrongdoing:** Includes but is not limited to fraud, corruption, bribery, financial misconduct, criminal activities, endangerment of health and safety, environmental damage, and any other illegal or unethical practices.

5. What to Report

Employees and associated individuals should report any of the following concerns:

- Criminal offenses
- Breaches of legal obligations
- Miscarriages of justice
- Health and safety dangers
- Environmental damage
- Financial malpractice
- Unauthorized use of company funds
- Any other unethical behaviour or practices

6. Reporting Procedures

- **Internal Reporting:** Employees should report concerns to their immediate supervisor or manager. If this is not possible or appropriate, concerns can be reported to the Compliance Officer or through the designated whistleblowing channel (whistleblow@morvernngroup.com).
- **Anonymous Reporting:** Morvern Group Limited allows for anonymous reporting. However, providing contact details may facilitate a more thorough investigation. This can be achieved by writing to or phoning the compliance officer.

7. Protection for Whistleblowers

- **Non-Retaliation:** Morvern Group Limited strictly prohibits any form of retaliation against individuals who report concerns in good faith. This includes threats, harassment, discrimination, or any adverse employment action.
- **Confidentiality:** All reports will be handled in strict confidence. The identity of the whistleblower will not be disclosed without their consent unless required by law.

8. Investigation Process

- **Acknowledgment:** The whistleblower will receive acknowledgment of their report within 5 working days.
- **Assessment:** An initial assessment will determine whether a full investigation is warranted.
- **Investigation:** If required, a thorough and impartial investigation will be conducted. The whistleblower may be asked to provide additional information or evidence.
- **Outcome:** The whistleblower will be informed of the investigation's outcome, subject to legal and confidentiality constraints.

9. False Allegations

Deliberately false or malicious reports will be treated as a serious disciplinary offense. However, employees who raise concerns in good faith, even if they turn out to be mistaken, will not face any negative consequences.

10. Responsibilities

- **Employees:** Must report any suspected wrongdoing and cooperate fully with investigations.
- **Managers:** Ensure that concerns are taken seriously and reported to the appropriate channels. Support and protect whistleblowers.
- **Compliance Officer:** Oversee the whistleblowing process, ensure investigations are conducted impartially, and maintain records of all reports and investigations.

11. Training and Communication

Morvern Group Limited will provide regular training to employees on the importance of whistleblowing and the procedures for reporting concerns. The policy will be communicated to all employees and made easily accessible.

12. Monitoring and Review

The Compliance Officer will regularly review this policy to ensure its effectiveness and compliance with legal requirements. The policy will be updated as necessary and reviewed annually.

13. Conclusion

Morvern Group Limited is committed to fostering a culture of integrity and accountability. By encouraging open communication and providing a safe environment for reporting concerns, we aim to maintain the highest standards of ethical conduct.

By order of the Board,
Jason Steen

Chairman of the Board
Morvern Group Limited