

WHISTLEBLOWING POLICY

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Clause 1: PID Act – Legal Protection

1.1 This Policy operates in accordance with the Public Interest Disclosure Act 1998 (PIDA), which grants legal protection to individuals who make disclosures about unlawful practices, misconduct, or serious regulatory breaches in the public interest. PIDA applies to employees, contractors, and external agents who disclose relevant information in good faith.

1.2 A disclosure qualifies for protection under PIDA if it concerns one of the specified categories of wrongdoing, including but not limited to a criminal offence, a breach of legal obligation, a miscarriage of justice, endangerment to health or safety, environmental damage, or concealment of any such act. The whistleblower must reasonably believe that the disclosure is made in the public interest.

Clause 2: Concern Raised, Investigated and Protected

2.1 Any concern raised under this Policy shall be promptly assessed, recorded, and investigated by a designated Compliance Officer or Whistleblowing Officer, following fair and impartial procedures.

2.2 The individual who raises the concern shall be afforded protections against retaliation, harassment, or any adverse employment-related action. This protection is enforceable under both internal disciplinary procedures and, where necessary, tribunal or court proceedings.

2.3 Investigations shall be proportionate, conducted with due regard for confidentiality, and completed within a reasonable timeframe. Outcomes shall be communicated where appropriate and legally permissible.

Clause 3: Code of Conduct and Business Ethics

3.1 The Company's Code of Conduct establishes the standard for acceptable workplace behavior and integrity. All breaches of the Code, whether observed or suspected, should be reported under this Policy.

3.2 Whistleblowers play a crucial role in maintaining ethical standards. They are encouraged to report misconduct, non-compliance, or unethical behavior that undermines public trust, commercial integrity, or regulatory obligations.

3.3 The Business Ethics Policy supports this by mandating corporate responsibility, transparency, and accountability in line with industry standards, the Companies Act 2006, and the Bribery Act 2010.

Clause 4: Examples of Reportable Concerns

4.1 Health and Safety Risks: Any acts or omissions that endanger employees, patients, or the public, contrary to the Health and Safety at Work etc. Act 1974.

4.2 Environmental Damage: Disclosure of actions that contravene environmental legislation such as the Environmental Protection Act 1990 or cause unlawful pollution.

4.3 Criminal Activity: Includes but is not limited to fraud, theft, bribery, corruption, or any breach of criminal law.

4.4 Financial Irregularities: Any falsification of records, accounting misconduct, or breaches of financial controls.

4.5 Unfair Treatment or Discrimination: Reports relating to victimization, harassment, or breaches of the Equality Act 2010.

Clause 5: Confidentiality and Support

5.1 All disclosures shall be handled with strict confidentiality. Whistleblowers shall be assured that their identity will not be disclosed without explicit consent, except where legally required.

5.2 Counselling, legal guidance, and internal support mechanisms shall be offered where necessary to protect the welfare of the whistleblower.

Clause 6: Informal and Formal Channels

6.1 Whistleblowing concerns may be raised informally to a line manager or formally through designated reporting mechanisms, including written statements or secure digital platforms.

6.2 Anonymous disclosures are permissible. Although anonymity may limit the investigation, the organisation will take reasonable steps to investigate all credible claims.

Clause 7: Support for Whistleblowers

7.1 The Company is committed to ensuring that individuals who report concerns in good faith are not disadvantaged in any way.

7.2 This includes support during investigations and protection from any form of professional retaliation.

Clause 8: Protection from Retaliation

8.1 Retaliatory acts, including demotion, dismissal, or bullying, against whistleblowers are strictly prohibited and constitute a breach of employment law.

8.2 Any individual found to have engaged in such acts will be subject to disciplinary action, up to and including termination of employment or contract.

Clause 9: Protected Channels

9.1 Whistleblowers may use designated internal hotlines, Compliance Officers, or Human Resources to report concerns. Such channels are monitored to ensure secure and timely handling of disclosures.

9.2 External disclosures made to regulators such as the Financial Conduct Authority (FCA), Medicines and Healthcare Products Regulatory Agency (MHRA), or the Care Quality Commission (CQC) are protected under law were made in good faith.

Clause 10: Investigation and Feedback

10.1 Each concern shall be recorded in a whistleblowing log, assigned to an investigating officer, and assessed for risk and veracity.

10.2 Feedback regarding the outcome, resolution, or action taken shall be provided to the whistleblower to the extent that confidentiality and legal considerations permit.

Clause 11: Duty of Vigilance

11.1 All employees, contractors, and stakeholders have a continuous duty to remain vigilant and report any breach of law, regulation, or ethical standards that come to their attention.

Clause 12: Additional Provisions for CGM Manufacturers

12.1 Compliance with FCA Handbook: CGM device manufacturers must comply with FCA governance requirements regarding reporting, accountability, and integrity under the Financial Services and Markets Act 2000.

12.2 Data Protection: Any whistleblowing system implemented must conform to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

12.3 Raising Awareness: Regular and documented training programs must be conducted to ensure all personnel understand their rights and obligations under this Policy, including how and when to report.