WHISTLEBLOWER POLICY

1. **POLICY STATEMENT**

Clonallon is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, Clonallon will endeavor to identify and remedy such situations. Therefore, it is the Company’s policy to ensure when a person has reasonable grounds to believe that an employee, manager, contractor, subcontractor, supplier, or customer related to the company has committed, or is about to commit, an offence that could harm the company’s business or reputation, or abuse Labour Standards inline with the Ethical Trading Initiative Base Code it denounces the wrongdoers in question.

The whistleblowing policy has been put in place to:

* Encourage employees and supply chain partners to disclose this information or behavior,
* Protecting complainants from reprisals,
* Treated all parties to an investigation in a fair and equitable manner,
* To ensure confidentiality as much as possible,
* Take corrective and disciplinary action if wrongdoing is discovered.

1. **PURPOSE**

The purpose of this whistleblowing policy is to encourage current and former employees, contractual third parties, and anyone involved in the NHS supply chain to communicate events that raise serious concerns about Clonallon or any of its stakeholders or supply chain. Clonallon encourages and will support staff who report illegal practices or individuals who violate the organisations policies, or abuse Labour Standards.

1. **SCOPE**

This policy applies to all employees of Clonallon and its supply chain, as well as contractual third parties, or partners doing business with the company.

1. **DUTY TO REPORT MISCONDUCT**

It is the duty of all employees, contractual third parties, subcontractors, suppliers, and customers to report misconduct or suspected misconduct, including fraud, and Labour Standards abuses to the company. This includes misconducts such as but not limited to:

* Providing false or misleading information, or withholding material information on Clonallon financial statements, accounting, auditing, or other financial reporting fraud or misrepresentation,
* Failure to comply with legal obligations, statutes, and regulatory requirements,
* Actions detrimental to Health & Safety or the Environment,
* Sexual or physical abuse of staff, customers, prospective staff, service providers, and other relevant stakeholders,
* Improper conduct or unethical behavior that undermines the Ethical Trading Initiative (ETI) Base Code or Clonallon’s Labour Standards Assurance Policy.

1. **REPORTING MISCONDUCT**

All events that raise concerns must be reported to the Labour Standards Management Representative. All concerns received will be treated in complete anonymity and will have no repercussions for the reporter.

Concerns can be reported by Telephone by calling Clonallon Laboratories Ltd on 028 417 54531 and requesting to speak with the Labour Standards Management Representative on ext. 103 or by requesting to speak with Stephen Lennon. In the absence of Stephen Lennon, Dermot Dempster will assume responsibility.

Concerns may also be raised by sending an email to [whistleblower@clonallon.com](mailto:whistleblower@clonallon.com)

Alternatively, concerns may be raised in writing to –

LSAS Management Representative

Clonallon Laboratories Ltd

5 Milltown Industrial Estate

Warrenpoint

Co. Down

BT34 3FN

Northern Ireland

1. **INVESTIGATION**

Raised concerns will be fully investigated by Clonallon. To perform a full and sufficient investigation the reporter must supply all information they have obtained or witnessed including but not limited to:

Business name(s) involved,

Identities involved,

Dates & times of incidents,

Locations,

Description of the concern,

Evidence (photographs, videos, call records, emails, memos, etc.),

Background of the concern and reason for the reporters concerns.

The Labour Standards Assurance Management Representative will perform a full investigation and risk assessment based on the concerns raised per Clonallon’s Whistleblower Procedure, Labour Standards Corrective Action Procedure, and the Labour Standards Emergency and Critical Response Procedure.

A full report will be provided to the whistleblower following the outcome of the investigation if requested. If any wrongdoing or potential wrongdoing is identified, the relevant regulatory bodies will be informed.

Any Clonallon staff member that receives a whistleblower concern and does not raise it immediately with the Labour Standards Management Representative or acts out of malice will face disciplinary measures inline with Clonallon’s Employee Handbook.