

## WHISTLE BLOWING POLICY

### Introduction

StartUp Factor Ltd (The Company) is committed to the highest standards of openness, probity and accountability regarding all aspects of the Start Up Loan scheme. As employees within the Company are often the first to realise that there may be something seriously wrong, the Company expects those who have concerns about any aspect of StartUp Factor's remit to come forward and speak up without fear of reprisal.

Thus, the company recognises that it is an important aspect of accountability and transparency to provide a mechanism to ensure that no employee (and other members) of the Company feel at a disadvantage in raising legitimate concerns regarding the Start Up Loans scheme.

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

These procedures are in addition to the Company's complaints procedures and other statutory reporting procedures.

All employees, contractors, other bodies, agency staff, etc. working for the Company are covered by this policy. The policy also applies to suppliers and those providing services under a contract within the Company on any of its premises.

### Scope of Policy

This policy is designed to enable employees of the Company to raise concerns to disclose information that the individual believes shows malpractice or impropriety on any aspect of the Start-Up Loans scheme.

A number of policies and procedures are already in place, including grievance, dignity at work, and discipline. This policy is intended to cover concerns that might be in the public interest and may (at least initially) be investigated separately, but might then lead to the commencement of such procedures.

These concerns might include:

- Financial malpractice, impropriety or fraud;
- Failure to comply with a legal obligation or statutes;
- Dangers to health and safety or the environment;
- Criminal activity;
- A miscarriage of justice;

- Professional malpractice;
- Improper conduct or unethical behaviour;
- Attempts to conceal any of the above.

## **Safeguards**

### **Protection**

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- in good faith;
- to an appropriate person/body; and
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety.

The Company will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the individual when they raise a concern in good faith.

### **Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal the individual's identity if they so wish. However, at the appropriate time the individual may need to come forward as a witness.

### **Anonymous Allegations**

This policy requires individuals to put their names to any disclosures they make. Concerns expressed anonymously will therefore not be considered by the Association.

### **Untrue Allegations**

If an individual makes an allegation in good faith that is not confirmed by the subsequent investigation, no action will be taken against that individual. However, if the individual makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against the individual concerned.