



Kallidus Global Whistleblowing Policy



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Policy Statement:

Kallidus are committed to conducting their business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect all Kallidus directors, employees and anyone acting on our behalf to do the same and to maintain the highest standards of ethical business behaviour. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work, and a key aspect of ensuring and maintaining Kallidus's commitment to conducting business with such integrity and in an open and fair manner is providing a robust whistleblowing policy and reporting channel for Kallidus so that all colleagues feel able to report any wrongdoing in confidence.

At Kallidus, we encourage employees to report any concerns as soon as they arise; such concerns can be of any nature, including any matters in connection with Kallidus personnel, as well as customers, suppliers and other third parties.

The principles for supporting Whistleblowing include:

- Encouraging and empowering colleagues to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Providing colleagues with guidance as to how to raise those concerns.
- Reassuring colleagues that they will be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- Encourage a culture of openness.
- Ensure compliance for Kallidus with the relevant legislation.

Scope

This policy applies to all employees. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow the procedure set out in this policy.



Definition:

Whistleblowing is the disclosure of information relating to suspected wrongdoing or dangers at work.

Protection for Whistleblowers

In the UK, the [Public Interest Disclosure Act 1998](#), shortened to PIDA, is the law that protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996 (ERA). It is important to note, that personal grievances and complaints may not be covered by Whistleblowing law and should be dealt with following the [Global Disciplinary, Capability and Grievance Policy](#).

What Type of Misconduct Should Be Reported?

It is important that Kallidus is informed about any conduct that is unlawful, dishonest or unethical as soon as possible and is committed to addressing it.

The below provides examples of the types of misconduct or behaviour that could give rise to a report, however, it is not an exhaustive list and Kallidus encourages all colleagues to report any behaviour or incidents which they have concerns about:

- Criminal activity or offences, including fraud, theft, and embezzlement.
- Corruption, bribery or blackmail.
- Financial malpractice, impropriety or mismanagement.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Conduct likely to damage Kallidus's reputation or financial wellbeing.
- Actions which endanger the health and safety of Kallidus personnel or the public.
- The deliberate concealment of information relating to any of the above matters.
- Any retaliation against someone for speaking up or "whistleblowing".

Confidential and Anonymous Reporting

All reports will be handled in complete confidence and the identity of the individual reporting the issue will be kept confidential and only disclosed to those who need to know it for purposes of any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Reporting a Concern

We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.



In the first instance the best person to contact would be your line manager who can then carry out further investigation. If it isn't feasible to report your concern to your line manager because you feel uncomfortable for any reason, have concerns with their involvement, or have received an unsatisfactory response, then the next best step is to contact a more senior manager at Kallidus or the People Team who will then carry out further investigation.

If there is evidence of criminal activity, then the investigating officer should inform the police. Kallidus will ensure that any internal investigation does not hinder a formal police investigation.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the People team.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to a member of the People Team for further advice.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

What to Expect when Reporting a Concern

- Kallidus or the prescribed person will consider your concern
- The decision will be then made if any action needs to be taken
- You may be asked for further information
- You will not have a say in how your concern is dealt with
- You may be kept in touch with the action taken, dependant on the situation
- You will not be entitled to much detail if there are confidentiality issues

External Reporting

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person.

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

Investigating Procedure

The investigating officer should follow these steps:



- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a work colleague at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of senior Kallidus staff and the Police, dependant on the situation.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.

Protection Against Retaliation

Kallidus will ensure that genuine concerns raised of a reasonable belief can be raised without fear of retaliation and will not affect the continued employment, work or career with Kallidus of the person who raised their concerns.

Kallidus will not tolerate harassment, victimisation or retaliation towards any person for raising concerns on the basis of a reasonable belief or objecting or refusing to participate in any act or practice that they honestly believe to be in violation of law or misconduct.

Any such harassment, victimisation or retaliation will be treated as very serious and will be a disciplinary offence in accordance with Kallidus's procedures.

Training

Kallidus provide training around Whistleblowing on Learn, which can be accessed via the following link: [Whistleblowing Course](#)

Glossary of Terms

Prescribed Person – The Prescribed Persons Order 2014 sets out a list of over 60 organisations and individuals that a worker may approach outside their workplace to report suspected or known wrongdoing. The organisations and individuals on the list have usually been designated as prescribed persons because they have an authoritative or oversight relationship with their sector, often as a regulatory body. An up-to-date list can be found [here](#).