

# Whistleblowing Policy |

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## Contents

Introduction .....	3
1. What is Whistleblowing?.....	3
1.1 Aim of the Policy .....	4
2. Scope of this Policy .....	4
2.4. What should be Reported?.....	5
3. Protection of the Whistleblower .....	5
3.1 Legal Rights.....	5
3.2 Harassment or victimisation .....	6
3.3 Support.....	6
3.4 Confidentiality.....	6
3.5 Anonymous Disclosures .....	6
3.6 Untrue allegations .....	7
4. Who should you raise your concern with? .....	7
4.2 How to raise your concern .....	7
5. What Waste Experts will do .....	8
6. Protection of Whistleblowers .....	8

## Introduction

Electrical Waste Recycling Group T/A Waste Experts (Waste Experts) are committed to conducting business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect all Waste Experts Directors, team members and anyone acting on our behalf to do the same and maintain the highest standards of ethical business behaviour. 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.

**Our mission is to lead the waste and recycling sector by providing innovative solutions that minimise environmental impact, protect our communities, and uphold the highest standards of corporate ethics.**

**Our vision is to create a future where waste is minimised, resources are conserved through a circular economy, and our staff and wider communities thrive together, demonstrating that social responsibility and profitability can coexist harmoniously.**

### 1. What is Whistleblowing?

The reporting by stakeholders including employees of suspected misconduct, illegal acts or failure to act within relevant legislation and laws. The aim of this policy is to encourage employees and other stakeholder who have serious concerns about any aspect of work undertaken by Waste Experts to come forward and voice these concerns.

Employees and other stakeholders such as customers, suppliers, members of the public and environmental groups are often the first to realise there may be something wrong within Waste Experts. Whistleblowing is viewed as positive act by the Company that can make a valuable contribution to the Companies efficiency and long-term success. It is not disloyal to colleagues to the Company to speak up.

Waste Experts are committed to a culture of honesty and openness, and we encourage all stakeholders as detailed above to raise any issue that does or has the potential to constitute malpractice or illegal activity impacting people or the environment. Waste Experts encourage freedom of speech. Anyone considering raising a concern should first read this policy which explains

- The types of issue that can be raised
- How the person raising a concern will be protected from victimisation and harassment

- How to raise a concern; and
- What Waste Experts will do

### 1.1 Aim of the Policy

The aim of the policy is to encourage and empower stakeholders to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated as appropriate, and that confidentiality will be respected without fear of victimization, discrimination, disadvantage or dismissal.

The policy is designed to

- Encourage confidence in raising serious concerns at the earliest opportunity.
- Provide stakeholders with avenues to raise concerns and receive feedback on any action taken.
- Reassure stakeholders that they will be able to raise genuine concerns without fear of reprisals, even if the concerns turn out to be unfounded.
- Encourage a culture of openness and ensure you receive a response to your concerns and are aware of how to pursue them if not satisfied.
- Ensure compliance with relevant legislation.

## 2. Scope of this Policy

This policy applies to all Waste Experts entities and personnel including directors, executives, officers, team members, contractors, agency workers, casual workers, consultants and trainees, no matter which team they work for and in which locations. It relates to actions by personnel as well as concerns with a customer, supplier or other third parties with which Waste Experts interact or conduct business.

This policy is intended to enable anyone who suspects or is aware of wrongdoing by Waste Experts affecting another person or service to report their concerns at the earliest opportunity to allow them to be fully investigated.

This policy is not to be used to question financial decisions or business strategy, nor should it be used to raise matters which should be raised under the grievance procedure e.g. harassment, bullying or discrimination, or that are already the subject of a disciplinary process.

## 2.4. What should be Reported?

Waste Experts want to hear about conduct that is unlawful, dishonest or unethical as soon as possible and is committed to addressing it. Examples of such conduct is below; this is not an exhaustive list, and we encourage 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
- Facilitation tax evasions
- Failure to comply with any legal or regulatory requirements
- Conduct likely to damage reputation or financial wellbeing
- Involvement with industries which promotes an adverse impact on health or the environment.
- Actions which endanger the health and safety of Waste Experts personnel or the public
- Actions which cause damage to the environment
- Unauthorised disclosure of confidential information
- The deliberate concealment of information relating to any of the above matters
- Disclosures related to a miscarriage of justice
- Any form of discrimination covering a protected characteristic
- Any retaliation against someone for speaking up or “whistleblowing”
- That information to nay of the above is being deliberately concealed.

Everyone has a responsibility to report any such misconduct or potential misconduct as soon as they become aware of it. If you are uncertain whether something is within the scope of this policy, it is preferable to raise concerns.

## 3. Protection of the Whistleblower

### 3.1 Legal Rights

This policy considers the ‘Public Interest Disclosure Act 1998 which protects workers making disclosures that are made in accordance with the Acts provisions and in the public interest. It is unlawful for any employee making a disclosure under this policy to be dismissed, victimised or harassed on the basis they have made an appropriate lawful disclosure in accordance with the Act. If the employee making the disclosure has participated in the action causing concern it is in the interest of that employee to come

into the open as soon as possible. Waste Experts cannot promise to take no action against the employee, but the fact they came forward will be considered.

### 3.2 Harassment or victimisation

Waste Experts recognise that the decision to report a concern is very difficult. If you honestly believe what you are disclosing, you have nothing to fear for doing your duty to the Company, your colleagues and all those impacted by our operations.

Waste Experts will not tolerate any harassment or victimisation of a whistleblower by anyone within the business (including informal pressures) and will take all necessary steps to protect you when you raise a concern in good faith.

### 3.3 Support

Throughout the process:

- You will be given full support of the Senior Management team who will be available to you as needed
- All concerns will be taken seriously
- Waste Experts will support you throughout the investigation which may include redeploying employees for the duration of the investigation,
- For external stakeholders, Waste Experts will endeavour to provide appropriate advice and support wherever possible, to include but not limited to contact details for relevant authorities.

### 3.4 Confidentiality

All concerns will be treated in the strictest confidence and every effort will be made not to reveal the identity of any whistleblower. Concerns can be submitted anonymously, however, in the event of further action you may be required to come forward as a witness you will be offered advice and support.

### 3.5 Anonymous Disclosures

This policy is designed to give you confidence to put your name on your disclosure, when ever possible. If you choose to remain anonymous it makes it difficult to protect your position or to provide feedback. Concerns raised anonymously are less powerful as they limit the investigations and will be considered at the discretion of Waste Experts based on

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the disclosure from other sources.

### 3.6 Untrue allegations

If you make a disclosure in good faith and believe it to be true, but it is not proved by the investigation, Waste Experts will recognise your concern and you have nothing to fear. If however, the investigation finds the allegation has been made frivolously, maliciously or for personal gain, appropriate action could be taken.

## 4. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved. You should normally raise your concerns with:

- Your Line Manager
- A departmental Head
  - Head of Commercial – [emma@wasteexperts.co.uk](mailto:emma@wasteexperts.co.uk)
  - Head of Operations – [charlie@wasteexperts.co.uk](mailto:charlie@wasteexperts.co.uk)
  - Head of Producer Responsibility – [stewart@wasteexperts.co.uk](mailto:stewart@wasteexperts.co.uk)
  - Head of ESG & Sustainability – [jane@wasteexperts.co.uk](mailto:jane@wasteexperts.co.uk)
- Waste Experts Managing Director – [shaun@wasteexperts.co.uk](mailto:shaun@wasteexperts.co.uk)

For external stakeholders any concerns can be logged via a stakeholder complaints form on our website. <https://wasteexperts.co.uk/duty-of-care/>

If you are unsure of who to contact, the independent charity [Protect](#) who can advise. You can also telephone them on 0261172520.

### 4.2 How to raise your concern

You can raise your concern by telephone 01484231600, by email or in person, or by using the [complaint form](#). The earlier you raise your concern the easier it is to take action. You need to provide the following as a minimum

- The area of concern (Environmental, Logistics, Modern Slavery, Unethical behaviour etc)
- What evidence you have to believe it is true
- Any background or history of the concern

Although you don't need to prove without doubt your concern, you need to demonstrate that you have a genuine concern related to the suspected wrongdoing.

You may wish to discuss with a colleague in the first instance and you may find it easier to raise the matter if there are 2 or more who have concerns.

You may invite a colleague or a union rep to any meetings or interviews you have in connection with the concern you have raised.

## 5. What Waste Experts will do

Waste Experts will acknowledge receipt of your disclosure within 24 hours of receipt. Check that the manager you are contacting is not away from work. Waste Experts are committed to fairness to all employees, and you may be invited to an initial interview to gather more information to determine if a full investigation is appropriate and if so what for it should take.

The investigation may need to be carried out under terms of strict confidentiality and the subject of the complaint will not be notified until (or if) it becomes necessary. In certain cases, such as ill treatment, or issues around Health and safety, immediate suspension may be required, as protecting others is paramount in all cases. Where appropriate, concerns raised may

- Be investigated by management, an internal audit or through the disciplinary/grievance procedure.
- Be referred to the Police or applicable regulatory body.

Within 10 working days of your concern being raised, the person assigned to investigate will write to you

- Acknowledging acceptance of the concern
- Advising who the matter will be handled
- Supply information of support mechanisms
- Advising further actions that may be taken

The amount of contact will depend on the nature of the concerns raised, potential difficulties and clarity of information. Meetings can be arranged away from the workplace and full support will be given for any difficulties you may face as a result of raising a concern such as advise and support if you are required to give evidence in criminal or disciplinary proceedings.

You will be given assurance that your disclosure has been properly addressed. Unless there are legal reasons why it is not possible, you will be kept informed of progress and the outcome of any investigation.

## 6. Protection of Whistleblowers

Identities of whistleblowers will not be made public, only the management involved in the disclosure will be aware of identities of those concerned. Unless required to give evidence at a criminal or disciplinary hearing.



Employees at work experts are covered by the Public Interest Disclosure Act (PIDA)1998, but this legislation does not cover certain other groups. There is no current legislation in the UK that protects all whistleblowers. Waste Experts will protect any employee who has raised a concern including re-deployment in another area of the business where this is feasible. The Company has zero tolerance of victimisation or harassment, and any instance will be full investigated and dealt with inline with the disciplinary and grievance procedure.

Employees are protected from retaliation such as disciplinary, dismissal and early termination of contract under PIDA. Prevent and ACAS can provide further information or support if needed.

If you suffer any unfair treatment because of your disclosure, you can make a claim to an industrial tribunal, alternatively the following organisations can provide support.

- Citizens Advise
- ACAS
- Whistleblowers UK
- Trade Union