



ICEFLO Limited

WHISTLEBLOWING POLICY

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2. PURPOSE OF THE POLICY

2.1 The purpose of this policy is to protect our Company, Employees and Customers from the adverse impact of improper conduct by anyone that our employees encounter in the course of their employment with ICEFLO Limited.

2.2 This policy is to be administered by the board of directors of the Company (the Board) and is part of the Company strategy to conduct business in a fair and legal manner.

3. INTRODUCTION

3.1 **Definition:** Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health & safety risks, damage to the environment and any breach of legal or professional obligations.

3.2 **Confidentiality:** Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

3.3 **Protected Disclosure:** However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

3.4 **Commitment:** ICEFLO Limited ("the Company") is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

4. SPECIFIC SUBJECT MATTER

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

2.1 **Criminal Offences:** That a criminal offence has been committed, is being committed or is likely to be committed.

2.2 **Non-Compliance:** That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.

2.3 **Miscarriage of Justice:** That a miscarriage of justice that has occurred, is occurring, or is likely to occur.

2.4 **Health and Safety:** That the health or safety of any individual has been, is being, or is likely to be, endangered.

2.5 **Environment:** That the environment, has been, is being, or is likely to be, damaged.

2.6 **Bribery:** That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.]

2.7 **Harassment:** That any person whom the Company encounters is being, or has been, subjected to any form of harassment, including but not limited to age, sex, race, disability, religion or belief, sexual orientation.

2.8 **Concealment:** That information tending to show any of the above, is being, or is likely to be, deliberately concealed.

they must use the Company's disclosure procedure as set out below.

5. HOW TO RAISE A CONCERN

4.1 **Internal Reporting:** We hope that in many cases you will be able to raise any concerns directly with your line manager. Line Managers must report your concern to the Designated Officer with 1 working day.

4.2 **Designated Officer:** Where you prefer not to raise your concern with you line manager, you should contact Jackie Smith, Director, directly and confidentially – jackie.smith@iceflo.com, 07824 638096.

4.2 **Internal Meeting:** We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy.

4.3 **External Reporting:** The law recognises that in some circumstances it may be appropriate to report concerns to an external body. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect is the UK's whistleblowing charity and operates a confidential helpline. You can contact them on 020 3117 2520 or click on this [link](#) visit their website.

6. PROTECTIONS

6.1 **Confidentiality:** This policy requires that an effective and efficient control environment is established and operated. The company-wide risk management process will be used to incorporate Operation Risk controls into the universal "operate" process.

6.2 **Detriment:** Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.

6.3 **Protected Status:** By following the procedures defined in this document, the information shared by employees will be afforded "protected" status. However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'

6.4 **Goof Faith:** If an employee makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that employee.

6.5 **Malicious:** If, after a concern has been raised, there is clear evidence that the concern was malicious, vexatious or known to be untrue, the employee who raised the concern may be subject to disciplinary procedures.

6.1 **Anonymity:** This policy encourages you to put your name to your allegation or concern whenever possible. Where an individual chooses to report their concerns anonymously, such anonymity will be respected. However, the Company's ability to investigate anonymous complaints can be hampered by not being able to further explore issues or obtain evidence during the investigative process. Furthermore, if the identity of the person who has provided the information is not known, it becomes extremely difficult to either reassure or protect you. Concerns expressed anonymously are much less powerful and will only be considered at the discretion of the Board.

7. NOTIFICATION TO EXTERNAL PARTIES

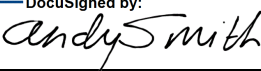
7.1 **Employee Criminality:** This policy requires that any concerns of a criminal nature are reported to the relevant authorities. This is a Board responsibility and must be done within 48 hours of any investigation leading to a reasonable suspicion that a crime has been committed by an employee of the Company.

7.1 **Employee Conduct:** This policy requires that any improper conduct by an Employee that has an impact on a Colleague, Customer or Supplier be reported to the affected party. This is a Board responsibility and must be done within 72 hours of any investigation leading to a reasonable suspicion that a such improper conduct has been committed.

6.2 **Customer Conduct:** This policy requires that any concerns regarding the conduct of an employee or representative of a Customer be reported to the relevant Customer authorities. This is a Board responsibility and must be done within 72 hours of any investigation leading to a reasonable suspicion of misconduct.

6.3 **Supplier Conduct:** This policy requires that any concerns regarding the conduct of an employee or representative of a Supplier be reported to the relevant Supplier authorities. This is a Board responsibility and must be done within 72 hours of any investigation leading to a reasonable suspicion of misconduct.

8. DOCUMENT CONTROL

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