



**QTS-Global Ltd**

**Whistle Blowing Policy**



**Amendments:**

No:	Amendment	Date	Name & Signature
1	Paragraph Numbering	03/07/2018	K. Pound

**Review Record:**

Planned Review Date	Review By	Date Reviewed	Next Review Date
Dec 15	K. Pound	Dec 15	Dec 16
Dec 16	K. Pound	12 <sup>th</sup> Dec 16	Dec 17
Dec 2017	K. Pound	03 July 2018	July 2019
July 2019			

The company is committed to the highest standards of corporate governance, integrity and business ethics, and expects all staff to report any knowledge or genuine suspicion of any impropriety or wrong doing within the company.

Normally any concern about a workplace situation should be raised with the employee's immediate manager or a more senior level of management. However, it is recognised that because of the seriousness and sensitivity of some issues, together with the knowledge of who the employee thinks may be involved in wrongdoing, this may be difficult or sometimes even impossible.

This policy sets out arrangements for individuals to raise serious concerns about malpractice or wrongdoing in ways which will protect them from reprisal.

The Board of QTS-Global Ltd has endorsed this policy and expects all staff to recognise their rights and responsibilities with regard to the reporting of serious concerns about malpractice or wrongdoing.

## **1. Policy**

This policy is intended to cover any concerns which are in the public interest. These might include:

- 1.1. Breach of any internal controls or company policy.
- 1.2. Financial malpractice or fraud.
- 1.3. Failure to comply with a legal obligation.
- 1.4. Dangers to Health and Safety or the environment.
- 1.5. Criminal activity.
- 1.6. Miscarriage of justice.
- 1.7. Improper conduct or unethical behaviour.
- 1.8. Attempts to conceal any of the above.

This is not intended to be a comprehensive list and any matters raised under this policy will be considered seriously.

## **2. Protection**

This policy is designed to offer protection to those employees who wish to disclose any concerns that they have. In order to ensure this the policy is used appropriately it is important that any disclosure is made using the procedures detailed in the policy, in good faith and in the reasonable belief by the individual making the disclosure, that the action they are reporting shows malpractice.

## **3. Confidentiality**

The Company will treat all disclosures in a sensitive manner. We will endeavour to keep the identity of an individual making an allegation confidential where required. However, the investigation process may inevitably reveal the source of the information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.

All individuals making a disclosure are encouraged to identify themselves and put a name to their disclosure. It is more difficult for the company to investigate fully concerns that are expressed anonymously and these can be less powerful, although the company will not ignore these if they have credibility and can be confirmed from alternative reliable sources.

#### **4. Untrue allegations**

If an individual makes an allegation in good faith, which after investigation is found not to be correct or is not confirmed, no action will be taken against that individual. If, however, the investigation shows that an individual has made a malicious allegation or an allegation which is known to be incorrect, and particularly if he or she persists with making them, disciplinary action may be taken against the individual concerned.

#### **5. Procedures for Making a Disclosure**

The individual should normally make the disclosure to the Managing Director or any other Director if they prefer or if the disclosure is about the Managing Director.