

## **WHISTLE – BLOWING POLICY**

### **A) INTRODUCTION**

Employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

### **B) QUALIFYING DISCLOSURES**

Certain disclosures are prescribed by law as qualifying disclosures. A qualifying disclosure means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the company has committed a relevant failure by;

- a) committing a criminal offence
- b) failing to comply with a legal obligation
- c) a miscarriage of justice
- d) endangering the health and safety of an individual
- e) environmental damage
- f) concealing any information relating to the above

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. Miter will take any concerns that you may raise relating to the above matters very seriously, and the Managing Director will investigate promptly taking any necessary remedial action.

We encourage you to use the procedure if you are concerned about any wrong doing at work. However, if the procedure has been invoked for malicious reasons or in pursuit of a personal grudge, then you will be liable to immediate termination of employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

### **C) THE PROCEDURE**

In the first instance you should report any concerns that you may have to the Managing Director who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate external official organisation or regulator.

If you do not report your concerns to the Managing Director, you should take them direct to the appropriate organisation or regulator.

All employees will receive training on whistle blowing procedures so that they understand the process and the protections Miter has in place for whistleblowers.

#### **D) TREATMENT BY OTHERS**

Bullying, discrimination, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

#### **E) ANTI-BRIBERY**

It's illegal to offer promised, give, request, agree, receive or accept bribes. Miter Industrial Supplies Ltd is committed to the objective of preventing bribery.

Should any employee be suspected of giving or receiving bribes, a full investigation will be undertaken by the Managing Director which if proven will result in the employees dismissal.

- F)** There will be no retaliation against genuine whistleblowers even where an investigation finds that there has been no wrong doing by Miter or its employees.

#### **G) WHISTLE-BLOWING BY NON-EMPLOYEES**

Miter Industrial Supplies Ltd recognizes that individuals who are not directly employed by the company (such as contractors, suppliers, consultants, or other third parties) may become aware of wrongdoing or concerns that fall under the scope of this policy.

Non-employees are encouraged to report any qualifying disclosures as outlined in Section B, including criminal offences, legal non-compliance,

health and safety risks, environmental damage, or concealment of such matters.

Reports from non-employees should be directed to the Managing Director via the designated confidential reporting channel.

[jc-winfield@miterindustrial.co.uk](mailto:jc-winfield@miterindustrial.co.uk)

If the individual is not satisfied with the response or explanation provided, they may escalate the matter to the appropriate external official organization or regulator.

Miter assures that all reports will be treated seriously and confidentially, and there will be no retaliation against individuals making genuine disclosures in good faith.

Signed:

A handwritten signature in black ink, appearing to be 'JC Winfield', written over a horizontal line.

Date: 23.11.25