

Whistleblowing Policy.



1. POLICY STATEMENT

1.1 Biffa encourages an open culture in which every person respects the views and opinions of their colleagues. Biffa is committed to conducting its business with honesty, integrity and fairness and expects all people to maintain these high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring, or to address them when they do occur and this is why Biffa has a Whistleblowing Policy.

1.2 This policy aims to:

- (a) Encourage people to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate.
- (b) Provide people with guidance as to how to raise those concerns.
- (c) Reassure people that they should be able to raise genuine concerns without fear of any comeback, even if they turn out to be mistaken.

2. WHO IS COVERED BY THIS POLICY AND WHO IS A WHISTLEBLOWER?

2.1 This policy applies to all individuals working within, for or with Biffa, including, directors, employees, consultants, contractors, casual and agency workers, suppliers and customers (collectively referred to as **people** in this policy).

2.2 A **whistleblower** is a person, who raises genuine concerns relating to any of the activities listed in section 3.

2.3 If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

2.3 If an employee is concerned about personal employment matters or the way they have been treated they should speak to their manager / HR Business Partner in the first instance to try and resolve informally or formally via the Grievance Procedure.

3. WHAT IS WHISTLEBLOWING?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligations or regulatory requirements
- bribery or corruption
- financial fraud or mismanagement
- negligence
- breach of our internal policies and procedures
- conduct likely to damage Biffa's reputation (including unethical conduct)
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters.

3.2 If you are uncertain whether something is within the scope of this policy employees should seek advice from their manager or HR Business Partner / Director. Ex-employees, suppliers or customers should contact Safecall see section 5.

4. RAISING A WHISTLEBLOWING CONCERN

You do not need to have firm evidence of malpractice being, been or likely to be committed before raising a concern. However, by explaining the concern fully and providing as much information as possible and the circumstances behind the concern, this assists in issues being investigated. All complaints will be treated seriously and with appropriate confidentiality as follows:

4.1 If you are an employee, we hope that you will be able to raise any whistleblowing concerns with your manager either orally or in writing. However, if you would prefer not to raise it with your manager for any reason or you feel that your manager has not addressed your concern adequately, you can raise your concern with a more senior manager, HR Business Partner or Director, or, if you would prefer through our external Safe Call Whistleblowing Hotline.

4.2 If you are a supplier, customer or an ex-employee you should contact our external Safe Call Whistleblowing Hotline detailed in section 5.

4.3 If you are a manager or HR Business Partner receiving a whistleblowing concern you should inform your HR Director / General Counsel & Company Secretary to ensure the incidence is recorded and appropriately investigated.

5. RAISING A CONCERN EXTERNALLY

Should a person prefer to report a whistleblowing concern to an external body, they can contact Safecall, an external and independent provider of a confidential whistleblowing hotline (0800 915 1571 or biffa@safecall.co.uk or www.safecall.co.uk/reports).

Further advice and support can also be sought from Public Concern at Work, the independent whistleblowing charity. For employees, where applicable, Trade Unions, may also be advise.

6. INVESTIGATION AND OUTCOME

6.1 Once a concern has been raised, an initial assessment will be carried out to determine the scope of any investigation. While we will endeavour to keep you informed of Biffa's response to the whistleblowing report, sometimes the need for confidentiality may prevent you receiving specific details of the investigation or action taken as a result.

6.2 In some cases we may appoint an investigator or team of investigators including people with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

6.3 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

7. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

7.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We encourage openness and will support people who raise genuine concerns under this policy, even if they turn out to be mistaken.

7.2 It is possible to raise a concern anonymously, or request that your details are kept confidential. We would encourage anyone raising concerns to provide their name and contact details to enable the company to ask further questions and clarification if necessary.

7.3 Genuine whistleblowing reports, made without malice will not result in any detrimental treatment to the whistleblower, even if it is a mistake. Anyone who raises a genuine concern has the right not to be dismissed, subjected to any other detriment or victimised because of their disclosure. Should a complaint be found to be malicious, action may be taken against the whistleblower.

However, any act of retaliation or intimidation against a whistleblower will be considered as a form of victimisation and will be treated accordingly. If an employee believes they have suffered any such treatment, they should inform their manager, HR Business Partner/more senior manager/ Director immediately.

Whistleblowing Hotline.

Contact Number: 0800 915 1571

Email: biffa@safecall.co.uk

or www.safecall.co.uk/reports

