

	Title: IdealMed Ltd Whistle-blower Policy	FRM No.: IM-POL-03
Issue Date: 01-Oct-2021	Issue No. 01	

Scope:

The policy applies to all IdealMed Ltd employees.

Objective:

The objective of this policy is to outline the United Kingdom law regarding whistleblowing and how whistleblowing is recognised in the organisation.

Policy Statement:

IdealMed Limited employees are protected by law in instances whistle blowing is deemed required by the employee, employees are protected under the Public Interest Disclosure Act 1998 (PIDA), which protects employees who blow the whistle about wrongdoing. Employees who make protected disclosures under the PIDA can claim unfair dismissal if their contract is terminated due to the disclosures.

The following non-exhaustive list outlines examples of qualifying disclosures:

- *A criminal offence,*
- *A breach in legal obligation,*
- *A miscarriage of justice,*
- *A danger to any individuals health or safety,*
- *Damage to the environment,*
- *Deliberate covering up of information relating to the above.*

The relevant failure can also involve conduct that took place outside the UK. In addition, it does not matter if Non-UK law applies to the relevant failure, the disclosure will still be applicable.

Employees who work on behalf of IdealMed Ltd must have a reasonable belief that the information disclosed points to one or more of the relevant failures in the non-exhaustive list above, which can relate to past, present or likely future activities. The belief does not to be correct if it is honestly held in the circumstances prevailing at the time of the disclosure.

Certain disclosures are excluded from protection, these include disclosures prohibited under the Official Secrets Act 1989 and those subject to legal professional privilege.

Disclosures made by an IdealMed Ltd employee are only protected if they are made to an appropriate party. As referenced in the PIDA, Whistle-blowers are protected when making disclosures in good faith to:

- *Their Employer, either directly or through an internal company procedure,*
- *Another person whom they reasonably believe to be solely or mainly responsible for the relevant failure.*

IdealMed Ltd employees who have been dismissed or believe that they have suffered detriment can bring a claim before an employment tribunal in line with a three-month limitation period for unfair dismissal claims, with the opportunity for extension if the claims are made after following the statutory grievance procedures under The Employment Act 2002, or if the tribunal exercises its discretion to extend the time limit.

Managing Director: Colum Watters



Date: 01-Oct-2021

Quality & Project Manager: Sam Gifford



Date: 01-Oct-2021