METROL®

Human Resources

Document Number

PM017

Document Title

Whistleblowing

Control Record

Rev	Date	Change Description	Author	Checked By	Owner Approval
01	20/04/23	Inception	C. Henderson	J. West	D. Tredinnick
02	06/04/2026	Employment Rights Act 2025 update	N Adamson	A Anagboso	D. Tredinnick

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1. Policy Statement

Metrol is committed to conducting business with honesty and integrity and promotes a free and open culture where employees are encouraged to communicate concerns internally at the earliest opportunity, with assurances disclosures will be treated seriously and in strict confidence. Disclosures can be made in person, or anonymously.

This policy applies to all employees. Individuals who work or have worked for Metrol, including former employees, self-employed contractors, and agency workers, are also encouraged to use it.

This policy does not form part of your contract of employment, but it is a condition of employment employees shall abide by the rules and policies implemented by Metrol. Metrol may amend the policy at any time.

2. What is Whistleblowing?

Whistleblowing is the act of reporting suspected wrongdoing at work and includes wrongdoing that is occurring, has occurred, or may occur within the company. It is not necessary for the employee to prove the wrongdoing has occurred/is occurring/is likely to occur - a reasonable belief is sufficient to disclose the concern, but the employee must reasonably believe that making any such disclosure is acting in the public interest.

Qualifying disclosures include allegations about any of the following:

- the committal of a criminal offence;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- serious health and safety risks, posing danger to an individual;
- risk of or actual damage to the environment;
- sexual harassment or risk of sexual harassment occurring; and
- if you believe someone is covering up wrongdoing.

Examples of wrongdoing might include, but not be limited to:

- unsafe working conditions
- lack of, or poor response to a reported safety incident
- suspicions of fraud and/or corruption
- a bullying culture
- not having adequate insurance cover in place
- abuse of authority
- other unethical conduct

Should the concern not meet the requirement of a qualifying disclosure, you should raise this under Metrol's Grievance Policy. Note that the ERA 2025 has officially included sexual harassment as a "qualifying disclosure". As such, reporting sexual harassment -whether against oneself or others, can be a protected disclosure. Where a concern is raised under this Whistleblowing Policy and it is not appropriate to do so (for example, it relates to a personal grievance), the receiving manager will confirm the matter will be addressed either informally, or under the Grievance Policy. If you are unsure whether your concern should be raised under this policy or the Grievance Policy, the advice of Metrol's HR department may be sought.

3. Raising a Concern

In the first instance, concerns should be raised formally or informally with your line manager. However, where you prefer not to raise it with your line manager for any reason, you should contact HR.

When raising a concern, it is important that relevant information is provided, including:

- the background and history of the concern(s) (including relevant dates, names, and positions of those who may have contributed to the concern); and
- the specific reason for making the disclosure. Although someone making a disclosure will not be expected to prove the truth of any wrongdoing, they will need to provide information to the individual they have reported it to, to demonstrate there are reasonable grounds for concern.

Where possible, concerns should be raised in writing (including email).

All disclosures will, in so far as possible, be treated in strict confidence, with Metrol's HR Department working closely with the employee to find a way of maintaining confidentiality throughout the process. Metrol will not, without the employee's consent, disclose their identity to anyone, however there may be circumstances whereby a disclosure of identity is needed, for example it is required by law. This will be discussed with the employee in the first instance to mutually decide next steps.

4. Raising a Concern Anonymously

This policy encourages employees to put their name to a disclosure. Employees may, if they wish, disclose information anonymously, either by using the red drop box located at HMP Reception, or the form below:

Speaking Up At Metrol - https://forms.office.com/e/0tth7brhLJ

However, completely anonymous disclosures are difficult to investigate as Metrol would not be able to contact the employee to discuss their concern or ask them for further information. Therefore, in exercising discretion to accept an anonymous disclosure, the following factors will be considered:

- the seriousness of the issue raised.
- the credibility of the disclosure; and
- whether the concern can realistically be investigated from factors or sources other than the whistleblowing employee.

5. How Metrol Will Respond

Any concerns raised under this policy will be investigated thoroughly and promptly. Following receipt of a disclosure, an investigation meeting will be held between HR (or another impartial manager) and the employee to gather as much information as possible regarding their concerns, including any supporting evidence they may have, or the identification of any witnesses. This meeting will be held within 7-14 working days following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised, gathering all relevant information, including appropriate documentary evidence or witness statements. This investigation will be completed within 4 weeks of receiving the disclosure. If this is not possible, the investigating manager will speak to the employee in advance of the completion deadline to agree an extended period of investigation.

Once the investigation is complete, the investigating manager will write to the employee confirming the outcome. If the employee is not satisfied with the explanation or outcome, they may raise a formal complaint under the Grievance Policy.

6. Protection for Whistleblowers

Metrol is committed to openness and will support employees raising genuine concerns under this policy. Even if an employee makes an allegation of wrongdoing which is not confirmed by an investigation, if the disclosure was made on reasonable grounds, the employee will not suffer any form of reprisal or detriment.

Employees must not suffer any detrimental treatment as a result of raising a genuine concern. Further, Metrol will not tolerate the harassment or victimisation of, or retaliation against any employee that has made a disclosure; any such behaviour, if upheld following investigation, could result in disciplinary action, potentially leading to dismissal. If you believe that you have suffered any detrimental treatment, you should inform HR immediately.

Please be aware that no contract such as NDA's or settlement agreements can prevent an employee from whistleblowing about any harassment or discrimination.

7. False Allegations

If Metrol concludes that an employee has made false allegations maliciously, then such disclosure will constitute a disciplinary offence for the purposes of Metrol's Disciplinary Procedure and may constitute gross misconduct, the sanction for which is summary dismissal.

8. External Disclosures

This policy aims to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. However, if an employee is unsatisfied with the outcome of an investigation or if, for any reason, does not feel comfortable raising a concern internally, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external prescribed person or body.

The full list of prescribed persons and bodies can be found on the UK Government website - https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies