



Whistleblowing Policy

Policy Statement

JTL conducts its business with the highest standards of integrity and honesty at all times and expects all employees to maintain these same standards in everything they do, both in and outside of work. Employees are therefore encouraged to report any wrongdoing by JTL or its employees that falls short of these business principles. These standards are outlined in the JTL Code of Conduct.

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace, but it is the aim of this policy to ensure that, as far as possible, JTL's employees are able to tell the Company about any concerns at work about any dangers or illegalities which may affect others, which they believe has occurred or is likely to occur.

JTL recognises that employees may not always feel comfortable about discussing their concerns initially, especially if they believe that JTL itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter with JTL that concerns them in the knowledge that it will be taken seriously, treated as confidential and no action will be taken against them for raising the issue. Whistleblowing should be viewed as a valuable activity which can positively influence our lives and improve the business, and which can address potential serious issues before any damage is done.

Employees are encouraged to use the procedure set out below if they have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal or contractual obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these.

Employees are also encouraged to use this procedure in reporting any allegations of bribery or corruption, or any suspected breaches of the Fraud Policy. Employees are assured that any allegations of bribery or corruption will be treated in a safe and confidential manner.

This policy is reviewed and approved annually by the JTL Board.

Signed:



Dated:

14/12/23

Sir John Low

Chair

Reporting Procedure

In the first instance, the matter should be discussed with the employee's line manager if appropriate. This informal approach will be treated as completely confidential within JTL. The line manager will then conduct an initial investigation and will inform their Director whether the matter requires further investigation.

This approach may not be appropriate in more serious circumstances or in situations where the line manager themselves may be implicated. In this situation, employees should feel able to initially raise their concern with a more senior member of management including the Chair of the Board of Trustees if the matter concerns the Chief Executive.

Following this, if the matter requires further investigation, this will be conducted by an employee appointed by the relevant Director in each case. The employee will be informed of the outcome of the investigation and what action, if any, has been taken.

If the employee is unhappy at any stage regarding the speed or conduct of the investigation or the way in which the matter has been resolved, then they should refer the matter to the Chief Executive/Chairperson.

Employees are advised to document all concerns in writing and try as be as accurate as possible when recounting details such as dates, times and locations.

JTL undertakes that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47b of the Employment Rights Act 1996. In the event that the employee believes they/she is being subjected to a detriment by any person within JTL as a result of their decision to invoke the procedure the assisting person (line manager/Director) must be informed immediately and appropriate action will be taken to protect the employee from any reprisals.

If it should become clear that the procedure has not been invoked in good faith, for example malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of JTL's disciplinary procedure.

JTL recognises that there may be matters that cannot be dealt with internally and that external authorities will need to become involved. Where this is necessary, JTL reserves the right to make such a referral without the employee's consent.

First Stage – “Blowing the whistle”

- Discuss matter with line manager, or
- Another appropriate manager, or
- Your line manager's manager, or
- Another company manager as appropriate, or
- The chair of JTL's Finance, Audit and Risk Committee
- Manager / Trustee will then undertake investigation.

Second Stage –Further Investigation

- Director / Chair (a position above the initial report) appoints a designated officer to conduct further investigation, if this is required.

Third Stage –Outcome

- Employee informed of the outcome, and any action taken.
- If employee not happy with the conduct or manner of investigation, the option exists to refer to the Chief Executive for review.