



WHISTLEBLOWING POLICY

Introduction

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

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. The PASD Freeport Company will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure must be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

The Procedure

In the first instance you should report any concerns you may have to the PASD Freeport Chief Executive. If your concerns are about the Chief Executive, you should make them known to the Chair of the PASD Freeport Board of Directors.

If you do not report your concerns to the Chief Executive, you should take them direct to the appropriate organisation or regulatory body.

Treatment by Others

Bullying, 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.