

Whistleblowing Policy

PL-013 Whistleblowing Policy

Date:	Changed by	Change/Amendment	Version
Apr 2021	T. Ellis	First issue	v1.0
May 2022	T Ellis	Annual review	v2.0
Aug 2023	H. Warner	Annual review	V3.0

Whistleblowing Policy

This Policy is intended to encourage SigTech Rail Consultancy Ltd, Senior Management, staff (paid and contract) and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution under the Public Interest Disclosure Act 1998.

The Whistleblower should promptly report the suspected or actual event to their Line Manager.

Disclosures qualifying for protection must fall under the following categories:

- A criminal offence, including offences such as theft, fraud or acts of bribery.
- The breach of a legal obligation.
- A miscarriage of justice.
- A danger to the health and safety of any individual.
- Damage to the environment.
- Deliberate covering up of information tending to show any of the five matters above.

If the Whistleblower would be uncomfortable or otherwise reluctant to report their Line Manager, then the Whistleblower could report the event to the next higher or another level of management, including to the Managing Director.

The Whistleblower can report the event with his/her identity or anonymously. This is done by a recorded delivery letter, marked confidential being sent to the head office, addressed to the Managing Director.

The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith - that was not done primarily with malice to damage another or the organisation.

A Whistleblower who makes a report that is not done in good faith is subject to discipline, may include termination of contract, or other legal means to protect the reputation of SigTech Rail Consultancy Ltd.

Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, this may include termination of contract with SigTech Rail Consultancy Ltd under the Public Interest Disclosure Act 1998.

Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

The Managing Director and Senior Managers who receive the reports must promptly act to investigate and/or resolve the issue. During the investigation, an interview will be conducted with the whistleblower and they will be asked to provide a written witness statement setting out the nature and details of the disclosure and the basis for it.

The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation and/or resolve the issue.

If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or independent authority.

The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organisation are served with a writ by the court.

This Policy shall be made available to all employees and those working on behalf of SigTech Rail. In addition, it will be displayed at each site as appropriate.

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This policy shall be used in association with SigTech Rail's Data Protection, PL-008 and Data Privacy Policy, PL-009

The Whistleblowing policy shall be reviewed annually or where additional factors require attention.

Signed:

A handwritten signature in black ink, appearing to be 'Pete Lindley'.

Pete Lindley
Managing Director
Aug 2023