

Whistleblowing Policy



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Overview

iMeta Training is committed as a business to the highest standards of openness, probity and accountability to enable company employees to voice concerns in a responsible and effective manner.

Where an individual discovers information that indicates actual or potential serious malpractice or wrongdoing within the organisation that may affect the public interest, it should be disclosed internally without fear of reprisal and there should be arrangements to enable this to be done independently of line management reporting processes if appropriate. Examples of this may include criminal offences such as fraud or financial impropriety, failure to meet legal obligations, health and safety breaches and wilful damage to the environment.

The Public Interest Disclosure Act, which came into effect in 1998, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

From 6 April 2026, the scope of protected disclosures under whistleblowing legislation has been extended to include disclosures relating to sexual harassment. This means that where an employee raises a concern, in the public interest, regarding actual or potential sexual harassment within the organisation, such disclosures will be treated as protected disclosures under this policy, provided they are made in accordance with the relevant statutory requirements. The Company will ensure that any individual making such a disclosure is afforded appropriate protection from detriment or dismissal as a result of raising the concern. All such matters will be handled sensitively, confidentially and in line with this policy and the Company's commitment to maintaining a safe and respectful working environment.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is reasonable to expect employees to follow the internal processes as set out within this policy rather than air their

Whistleblowing Policy



disclosures externally. Personal grievances and complaints are not usually covered by whistleblowing law.

Safeguards

This policy is designed to offer protection to those employees of the company who disclose such concerns provided the disclosure is made:

- In good faith

Whistleblowing Policy



- In the reasonable belief of the individual making the disclosure that it shows malpractice or impropriety and that the disclosure is made to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to follow the procedure.

The company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against the individual concerned. In making a disclosure, the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, disciplinary action may be taken. In extreme cases, false, malicious or wild allegations could give rise to legal action against the individual concerned.

Procedures for Making a Disclosure

Information relating to alleged cases of malpractice or wrongdoing should be reported by an employee to the immediate line manager or directly to the Operations Manager, unless it is in any way related to his/her actions, who will then carry out an investigation. If the Operations Manager is alleged to be implicated or there is an actual or perceived conflict of interest, the information should be made available to the Managing Director who will then determine the course of any further action. The "whistleblower" has the right to bypass normal business operational line management reporting processes and raise any concerns directly with the most senior person/s in the organisation.

N.B. refer to the company Malpractice and Maladministration policy for further information and procedural guidelines