

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Whistle-Blowing Policy

General Statement

Arran Isle Limited Group is committed to ensuring that the manner in which we operate and conduct our business is to the highest standard.

We recognise, however, that there may be occasions when employees have genuine concerns about the actions of their colleagues, managers or the operating company within which they work. The purpose of this Policy is to provide a framework for individuals to raise such concerns without fear of adverse repercussions.

Scope of the Policy

Employees should invoke the Whistle-blowing Policy where they have genuine concerns about any of the following:

- harassment/bullying or discrimination of any kind;
- breach or possible breach of the Group’s policies on;
 - Equality & Diversity
 - Gifts & Hospitality
 - Conflicts of Interest
 - Competition Compliance
 - Code of Business Conduct
 - Bribery, Corruption, Fraud & Theft
 - Anti-Facilitation of Tax Evasion
 - Modern Slavery Act 2015
 - Health and Safety
- abuse of position or authority;
- theft or misappropriation of any assets, goods, products or intellectual property that belong to the Group, its customers, suppliers or associated third parties;
- breach or possible breach of confidentiality regarding sensitive or valuable information belonging to the Group, its customers, suppliers or associated third parties;
- misuse of any Group or any subsidiary’s IT hardware or software, or breach of a Group subsidiary’s IT policy;
- abuse or actions contrary to local business regulations (e.g. clocking in colleagues);
- endangering health and safety;
- damage to the environment;
- any misrepresentation of the true state of affairs of the Company (including any financial irregularity, fraud or theft);
- a criminal offence;
- failure to comply with any legal obligation;
- a miscarriage of justice; or
- the deliberate concealment of any of the above.

Procedure

1. Where an employee has a genuine concern about any of the above, the issue should normally be raised with his/her immediate line manager.

If the employee feels unable to do so, the concern should be raised with a more senior manager (typically a Director of the operating company within which the employee works).

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If the employee feels unable to raise the issue with anyone involved in the operating company within which he/she works, the matter may be raised by phone or by writing to Mark Wild, Corporate Services Director, (telephone number: +44 (0)1422 328850. Address: Arran Isle Limited, Brindley House, Premier Way, Lowfields Business Park, Elland, West Yorkshire, HX5 9HF).

2. The issue will be investigated as quickly as possible and the outcome communicated to the employee.

Confidentiality/Anonymity

Any concern raised under this Policy will be treated in confidence as far as is possible, subject to the need to ensure a full investigation of the issue.

A complainant may wish to remain anonymous and the Group will ensure the individual’s anonymity wherever possible and as far as is reasonably practicable.

Ultimately, however, the Group reserves the right to investigate any complaint raised under this Policy in the most appropriate manner to ensure that all aspects are fully and rigorously followed up. Where circumstances arise which mean that a full and thorough investigation cannot be conducted without revealing the identity of the complainant, this will be discussed with the individual concerned prior to any further action being taken.

Disciplinary Action

Where an investigation confirms that there has been wrongdoing/malpractice, appropriate action will be taken which may include summary dismissal and/or reporting the matter to the police/other statutory bodies.

The objective of this Policy is to provide a process to encourage individuals to raise genuine concerns. It may be, however, that the complainant has him/herself been involved in wrongdoing. In such a situation, he/she would have to answer for his/her actions and should not expect immunity from disciplinary/criminal proceedings. In such circumstances, however, the fact that he/she raised the concern would be taken into account.

Where it is found that an employee has abused the Whistle-blowing Policy and has made a deliberately false or malicious allegation, he/she may be liable to disciplinary action, which may result in dismissal.

Protection

The Group will take all reasonable steps to ensure that any employee who raises a concern under this Policy is not victimised or suffers a detriment of any kind, at any time during or after raising a concern.

Should an employee believe that they have been victimised or suffered a detriment or believe that their complaint has not been fully investigated, they should immediately contact Mark Wild, Corporate Services Director (telephone number: +44 (0)1422 328850. Address: Arran Isle Limited, Brindley House, Premier Way, Lowfields Business Park, Elland, West Yorkshire, HX5 9HF).

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Implementation & Review

This policy will be reviewed annually by the Group Board of Directors and implemented and maintained by senior managers and relevant employees who interact at any level with customers, suppliers and other external parties.

Communication

It is the responsibility of the legal entity or business unit’s Managing Director (or equivalent) to ensure that this policy is regularly communicated to all employees and to all new employees when they join the business.



**Martin Wardhaugh
Group Chief Executive
February 2019**