



**WHISTLE-BLOWER  
POLICY**  
**SEVENTY-NINTH™ GROUP**

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### The 79th GRP Limited – Whistle-blower Policy

Any employee can report certain types of wrongdoing. This will usually be something you've seen at work – though not always.

The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

As a whistle-blower you're protected by law – you will not be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Employees should be clear that complaints or disclosures that count as whistle-blowing include the following;

- a criminal offence, for example fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance
- you believe someone is covering up wrongdoing

Complaints or that do not count as whistleblowing include;

- personal grievances
- harassment
- discrimination

unless your case is in the public interest. These complaints should be reported under your employers grievance procedure.

Should an employee need to inform management of any breaches of this policy (or any other policies of the Company) the following 'whistle-blowing' procedures should be adopted.

- A. Employees may make an anonymous claim or disclosure, but the investigating officer from the Company may not be able to take the claim forward if you do not provide all the information they need.
- B. Employees wishing to make a disclosure should initially seek a confidential meeting with the Head of Operations. The employee making the disclosure can be accompanied by a trade union representative or colleague at any meeting about the disclosure.
- C. At that meeting you may be asked for further information and you will not have a say in how your concern is dealt with, as they have a duty of confidentiality to all members of staff.
- D. If the Head of Operations is connected to the potential problem/issue, the employee should seek a confidential meeting with the Director of Operations.
- E. At the meeting with either the Head of Operations or the Director of Operations, the employee must explain their issues and/or concerns. All discussions will be treated in absolute confidence.



- F. Any employee disclosing breaches of this policy or any other matter/policy must be informed that their disclosure will not affect their position at work.
- G. The Head of Operations and/or the Director of Operations must fully investigate the matter in a sensitive and confidential manner, including interviewing the relevant parties. They must also determine if they are the most appropriate party to undertake the investigation.
- H. When the investigation is concluded the Head of Operations or the Director of Operations must take the appropriate action, whether this means notifying external agencies or undertake the necessary internal disciplinary actions.
- I. The employee making the disclosure must not be penalised in any way unless the disclosure they have made is of a malicious or untrue, in which case they face the necessary actions under the relevant conduct and discipline rules in the Company.
- If an employee is not satisfied with how the matter has been dealt with by the management/ employer he/she can contact either;
- ACAS (Advisory, Conciliation and Arbitration Service), or
  - the whistle-blowing charity – Protect, or
  - your trade union for more guidance.

If an employee feels they have been treated unfairly after whistle-blowing, you can take your case to an employment tribunal (See Code of Practice 1 from ACAS). If you reported your concern anonymously, you may find it harder to argue that your unfair treatment was as a result of your whistleblowing.



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[www.the79thgroup.co.uk](http://www.the79thgroup.co.uk)

[info@the79thgroup.co.uk](mailto:info@the79thgroup.co.uk)

Private and Confidential

#### UK OFFICE

804 Merlin Park,  
Ringtail Road, Burscough,  
Ormskirk, Lancashire. L40 8JY

#### UAE OFFICE (DUBAI)

P.O.Box: 487838  
Jumeirah Lake Towers,  
Dubai, United Arab Emirates.

#### JAPAN OFFICE (TOKYO)

Burex Kojimachi 3-5-2  
Kojimachi, Chiyoda-KU  
Tokyo, Japan.

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