

The purpose of this policy is to provide guidelines relating to Whistleblowing for all staff, associate staff and apprentices.

PRINCIPLES

Apprentices, Learners and Employees are often the first to realise that there may be something seriously wrong within a Company. However they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

ESLGi Group are committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of our work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise serious concerns within the Company rather than overlooking a problem.

Scope

The policy applies to all ESL Gi Group Apprentices, Learners and employees and associate staff.

Aims

This policy aims to:

- Encourage staff to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide avenues for staff to raise any concerns and receive feedback on any action taken
- Ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- Reassure staff that they will be protected from possible reprisals or victimisation if they have reasonable belief that the disclosure was made in good faith

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. The whistle-blowing policy is intended to cover major concerns that fall outside of the scope of other procedures.

These include:

- A criminal offence has been committed or is likely to be committed;
- Failure or likely to fail to comply with legal obligations or with statutes or internal regulations to which he or she is subject;

1. Personal Safeguards

Gi Group are committed to good practice and high standards and wants to be supportive

of employees and apprentices. As a company Gi Group recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for

whom you are providing a service.

2. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

3. Anonymous allegations

This policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Head of ESL.

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

- The seriousness of the issue raised
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

4. Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

5. How to raise a concern

Any member of staff who has reasonable belief that there is serious malpractice relating to any of the matters mentioned in the aims and scope of this policy should in the first instance raise their concerns with their line manager.

Concerns may be raised verbally or in writing. ESL Apprentices, Learners and Staff that wish to make a written report are invited to use the following format:

- The background and history of the concern (giving dates where applicable).
- The reason why you are particularly concerned.

The earlier you express the concern the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

6. How Gi Group Will Respond

ESLGi Group will respond to your concerns. Where appropriate the matters raised may be investigated by management, internal audit, or through the disciplinary process.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Some concerns may be resolved by agreed action without the needs for investigation. If urgent action is required this will be taken before any investigation is conducted.

The Company accepts that you need to be assured that the matter has been properly

addressed. Therefore, subject to legal constraints, we will inform you of the outcome of any investigation.

If you don't believe that an acceptable response has been made to the information that has been revealed you will be protected if a disclosure is made to an appropriate regulatory

body. However, ESL Gi Group will always endeavour to address any issues that are raised without involvement of outside bodies.

Responsible

The Head of ESL has overall responsibility for the maintenance and operation of this policy.