

Whistleblowing Policy

Company Name: MDD Fabrication & Engineering Limited

Policy Owner: Emanuel Diniz

Effective Date: 24/02/2025

Review Date: 24/02/2026

1. Purpose

This policy provides a framework for employees and stakeholders to report concerns about wrongdoing, misconduct, or unethical behaviour within the company. It supports compliance with the Public Interest Disclosure Act 1998 (PIDA) and recent updates to UK whistleblower protections.

2. Scope

This policy applies to:

- All employees (full-time, part-time, temporary)
- Contractors, consultants, agency workers
- Suppliers and other stakeholders

3. What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes:

- Criminal offences (e.g. fraud, theft)
- Health and safety risks
- Environmental damage
- Breaches of legal obligations
- Covering up wrongdoing
- Violations of UK sanctions laws

4. Reporting Procedure

Employees are encouraged to raise concerns internally in the first instance. Reports can be made:

- Verbally or in writing to the Whistleblowing Officer or Managing Director
- Via email to: [Insert confidential email]
- Anonymously, if preferred, though this may limit investigation effectiveness

5. Investigation Process

- Concerns will be acknowledged within 5 working days
- A confidential investigation will be conducted
- Feedback will be provided to the whistleblower where appropriate
- Records of all disclosures will be securely maintained

6. Protection for Whistleblowers

- No employee will suffer detriment for raising a concern in good faith
- Retaliation, victimisation, or dismissal due to whistleblowing is prohibited
- Support will be provided throughout the process

7. External Disclosures

If internal reporting is not appropriate or effective, disclosures may be made to prescribed bodies such as:

- HM Treasury (for financial sanctions)
- Health and Safety Executive
- Secretary of State for Business & Trade (for trade sanctions)
- Public Concern at Work (independent advice)

8. Confidentiality

All disclosures will be treated confidentially. The identity of the whistleblower will be protected unless legally required to disclose it.

9. Training & Awareness

- All staff will receive training on this policy during induction
- Annual refreshers will be provided
- Managers will be trained to handle disclosures appropriately

10. Review

This policy will be reviewed annually or following any legal or regulatory changes.