



TIMESING
HONEST SUPPORT, PRECISE ADVICE.

WHISTLEBLOWING POLICY



1 Introduction

At TIMESING, employees and suppliers may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their respective employment and provision of services terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees and suppliers to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3).

Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee or supplier making the disclosure, is made in the public interest.

TIMESING is committed to compliance with the Bribery Act 2010. We actively encourage a culture of honesty and openness and therefore all employees and suppliers are required to bring up to their line manager or other designated person any issue that, in their opinion, might constitute bribery or corruption.

2 Specific Subject Matter

If, in the course of employment or whilst contracted to provide a service, an employee or supplier respectively becomes aware of information which they reasonably believe tends to show one or more of the following, that:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- a miscarriage of justice that has occurred, is occurring, or is likely to occur;
- an act of modern day slavery or human trafficking has occurred, is occurring, or is likely to occur;
- the health or safety of any individual has been, is being, or is likely to be, endangered;
- the environment, has been, is being, or is likely to be, damaged;
- information tending to show any of the above, is being, or is likely to be, deliberately concealed;
- the business or any associated person has been, is being, or is likely to be receiving or offering bribes;



- any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

they must use the TIMESING disclosure procedure as set out below.

3 Disclosure Procedure

Information which an employee or supplier reasonably believes tends to show one or more of the above should promptly be disclosed to Paschal Walsh (Managing Director) so that any appropriate action can be taken.

Employees or suppliers will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.

However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'

For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to Paschal Walsh (Managing Director).

This policy has been approved & authorised by:

Name:	Paschal Walsh
Position:	Managing Director
Date:	1 September 2024