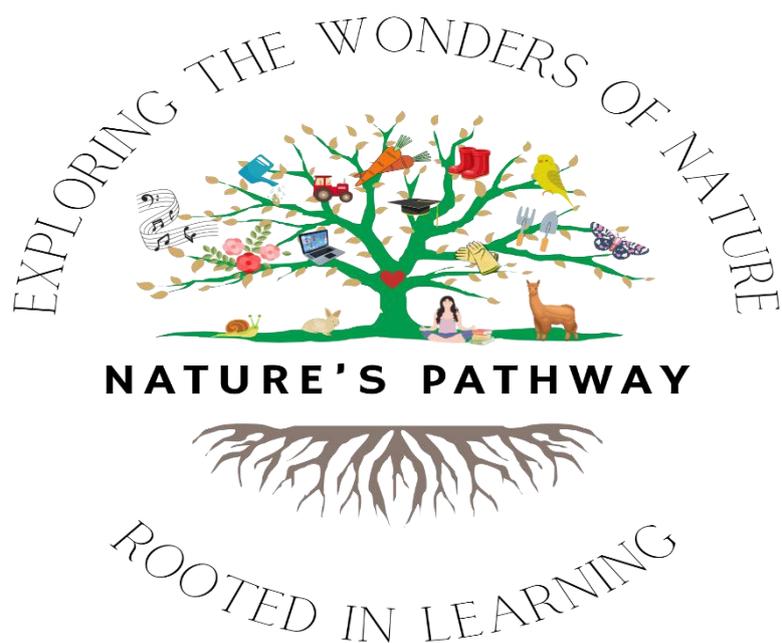


Natures Pathway



Whistleblowing Policy

Commencement Date: 31ST January 2026

Review Date: 31ST January 2027

Signed: N. Butler

Introduction

Whistleblowing means the reporting of suspected misconduct, illegal acts or failure to act and it is often employees who are the first to realise that there is or may be something seriously wrong. At whistleblowing is viewed as a positive act that can make a valuable contribution to our efficiency and long-term success. It is not disloyal to colleagues or to to speak up. We are committed to achieving the highest possible standards in all we do..

Purpose and Aims

The purpose of this policy statement is to:

- encourage employees who have serious concerns about any aspect at Nature Pathways to come forward and voice those concerns.
- ensure that employees can raise concerns about wrongdoing or malpractice within Natures Pathway without fear of victimisation, subsequent discrimination, disadvantage or dismissal.
- encourage and enable employees to raise serious concerns within Natures Pathway, rather than ignoring the problem or 'blowing the whistle' externally.

The policy aims to:

- encourage employees to feel confident in raising serious concerns at the earliest opportunity
- ensure employees receive a response to concerns and that they are aware of how to pursue them if they are not satisfied
- reassure employees that they will be protected from possible reprisals or victimisation if they have made a disclosure in good faith

This Policy is intended to enable those who become aware of wrongdoing at Natures Pathway affecting some other person to report their concerns at the earliest opportunity so that they can be properly investigated

Natures Pathway commitment to you

Natures Pathway is committed to good practice and high standards and to being supportive of you as an employee.

Natures Pathway recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you're saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service/training.

Natures Pathway will not tolerate any harassment or victimisation of a whistleblower and will take appropriate action to protect you when you raise a concern in good faith

and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedures

Natures Pathway support to you

Throughout this process:

- You will be given full support from senior management
- Your concerns will be taken seriously; and
- Natures Pathway will do all it can to help you through any investigation

What should be reported?

You should report any serious concerns you have, such as:

- Conduct which is an offence or a breach of law (a criminal offence that has been committed or failing to comply with any other legal obligation)
 - Disclosures relating to miscarriages of justice
- Racial, sexual, disability or any other discrimination
- Health and safety of employees or anyone else who comes into our workplace
- Damage to the environment
- Unauthorised use of our assets, such as company credit card
- Possible fraud or corruption
- Neglect or abuse of clients or
- Any other unethical conduct

Making a disclosure

You should normally raise concerns with:

- Your immediate manager
- A director

If your complaint is about your immediate manager or director, then the next most senior person in the organisation should be your point of contact.

You may make your disclosure in person, by telephone or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true

- The background and history of the concern (with relevant dates)
- And, any evidence you may have

You are not expected to prove the truth of your suspicion, but you will need to show to the person you raise your concern with that you have a genuine concern related to suspected wrongdoing or malpractice and that there are reasonable grounds for your concern.

What Natures Pathway will do

Natures Pathway will respond to your concerns as quickly as possible. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality (i.e. not informing the subject of the complaint until or if it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Within 10 working days of a concern being raised, the person investigating your disclosure will write to you:

- Acknowledging that the concern has been received
- Indicating how Natures Pathway Services proposes to deal with the matter
- Explaining what advice and support is available to you; and
- **Telling you whether further investigations will take place and, if not, why not**

Your legal rights

This Policy has been written to take account of the Public Interest Disclosure Act 1998 which protects employees making disclosures.

The Act makes it unlawful for to dismiss anyone or allow them to be victimised as a result of making an appropriate lawful disclosure in accordance with the Act

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support

Anonymous disclosures

This Policy encourages you to put your name to your disclosure whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or give you feedback.

Concerns made anonymously may be considered at the discretion of, considering

- The seriousness of the issue raised
- The credibility of the concern and
- The likelihood of confirming the disclosure from other sources

Untrue disclosures

If you make a disclosure in good faith and honestly and reasonably believe it to be true, but it is not confirmed by an investigation, Natures Pathway will recognise your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain appropriate action (that could include disciplinary action) may be taken

This policy was last reviewed on: 31ST January 2026

Signed: N Butler

Renew Date 31ST January 2027 or as needed