

## **Whistleblowing Policy**

Cross Cut Shredding Ltd is dedicated to maintaining the highest standards of openness, probity, and accountability. A crucial component of accountability and transparency is facilitating a mechanism that empowers staff and other members of the Company to responsibly and effectively report concerns. While employees are bound by contractual obligations to serve their employer faithfully and protect confidential information, the Company recognises the importance of disclosing information that reveals serious malpractice or wrongdoing within the organisation. This disclosure should be made internally without fear of reprisal, and mechanisms are in place to enable independent reporting.

### **Legal Protections:**

The Public Interest Disclosure Act provides legal protection to employees against dismissal or penalties resulting from the public disclosure of certain serious concerns. The Company has endorsed the provisions outlined below to ensure that staff members are not at a disadvantage when raising legitimate concerns.

### **Scope of Policy:**

This Whistleblowing Policy is designed to assist individuals who believe they have discovered malpractice or impropriety. It is not intended to question financial or business decisions taken by the Company and should not be used to reconsider matters already addressed under harassment, complaint, disciplinary, or other procedures.

### **Safeguards:**

- **Protection:** This policy is designed to offer protection to employees disclosing concerns provided the disclosure is made in good faith, and the individual believes it tends to show malpractice or impropriety. No protection from internal disciplinary procedures is offered to those who choose not to use the procedure.
- **Confidentiality:** Cross Cut Shredding Ltd will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential, ensuring it does not hinder or frustrate any investigation.

- **Anonymous Allegations:** While the policy encourages individuals to put their name to any disclosures, concerns expressed anonymously will be considered at the discretion of the Company, taking into account the seriousness and credibility of the concern.
- **Untrue Allegations:** If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. However, if an individual makes malicious or vexatious allegations, disciplinary action may be taken.

### **Procedures for Making a Disclosure:**

Upon receipt of a complaint, staff members must promptly pass the information to the appropriate designated investigating officer. Investigations may involve internal or external investigators and the police. Due to the varied nature of these complaints, precise timescales for investigations may vary.

The investigating officer will acknowledge the concern and report back in writing on the investigation outcome and proposed actions. The complainant will be kept informed of the investigation's progress.

### **Investigating Procedure:**

The investigating officer will:

- Obtain full details and clarifications of the complaint.
- Inform the member of staff against whom the complaint is made and consider the involvement of auditors or the police.
- Fully investigate the allegations and make a judgment detailed in a written report.
- The Company Director will decide on appropriate actions, invoking disciplinary procedures if the complaint is justified.

If the complainant is dissatisfied with the investigation, they may raise concerns with the Company Director or designated persons. If the allegations are unsubstantiated, employees may make disclosures to prescribed persons or bodies recognised by law.

Cross Cut Shredding Ltd is committed to fostering a culture of transparency and accountability, ensuring that legitimate concerns are addressed promptly and effectively. Any questions or clarifications regarding this policy can be directed to the Director or designated persons mentioned above. As part of our commitment to transparency and accountability, our policies are regularly reviewed, and the quality manual is shared with all employees. The management team and directors undertake an annual review to ensure our commitment to quality endures.



**Daniel Simmons**  
**Managing Director**

Last Review Date: January 2024  
Next Review Date: January 2025