

Dumarey Flybrid HR Procedures

EMPLOYEE WHISTLEBLOWING POLICY

Introduction

Dumarey Flybrid Limited (the “Company”), is committed to achieving our vision of transforming into a centre of excellence, operating to the highest standards. The Company’s Code of Conduct which can be found in the Employee Handbook is designed to ensure maintenance of such standards.

The Company recognises that the business can only achieve the high standards it sets through the conduct of its employees and contractors engaged in work for Dumarey Flybrid Limited. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do.

The aims of this Policy are:

- to encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected wherever possible;
- to provide employees with guidance as to how to raise those concerns; and
- to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken in their concerns.

This Policy does not form part of any employee’s contract of employment and it may be amended at any time.

This Policy applies to all individuals working at all levels of the organisation, including senior managers, officers and directors, employees, consultants, contractors, part time and fixed term workers and agency staff (collectively referred to as “staff” in this Policy).

Risk Appetite Alignment

The requirements outlined within this Policy support mitigation of Level 1 Risk Category; Legal. Compliance with policy requirements ensures that Dumarey Flybrid Limited continues to operate within Risk Appetite, which is:

Legal Risk: Legal Risk Appetite is considered Minimal reflecting a preference for safe options that have a low degree of inherent risk. This is considered to strike the appropriate balance for a private sector body, ensuring compliance without disproportionate effort relative to Averse and without accepting residual risk inherent with Cautious.

- Averse appetite for regulatory compliance risk; Dumarey Flybrid Limited will not undertake activity that is contrary to legal requirements except where a risk-based approach has been agreed as proportionate / appropriate e.g., GDPR.
- Minimal appetite in respect of any proposal on which legal advice has not been taken or risk assessments completed.
- Dumarey Flybrid Limited is Cautious towards risks stemming from legal cases brought against it where Dumarey Flybrid Limited has acted in accordance with the law, even though it may be commercially more cost-effective to settle disputes.

What is Whistleblowing?

Whistleblowing is disclosure of information which relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the “Act”). The Act specifies that any disclosure of information, which in the reasonable belief of the worker making the disclosure, tends to show one or more of the undernoted, is a protected disclosure under the Act:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal obligation;
- the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. It is important to note that the Act only covers protected disclosure by workers. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

This Policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Policy and Procedure.

If you are uncertain whether something is within the scope of this Policy, you should seek advice from the Whistleblowing Officer whose contact details are at the end of this Policy.

The Company is committed to acting ethically and with integrity in all business dealings and to taking steps to ensure that modern slavery and human trafficking do not exist in any part of our business or supply chains. If you have a concern that there may be a risk of modern slavery or human trafficking occurring within the Company, or in any part of our supply chains, then you are encouraged to raise your concerns using the methods set out below in section 3. More information on the Company’s compliance with the Modern Slavery Act 2015 can be found in our Modern Slavery Statement, which is updated annually.

Raising a Whistleblowing Concern

We hope that in many cases, you will be able to raise your concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious or you feel that your line manager has not addressed your concern, or you would prefer not to raise it with them for any reason, you should contact:

- the Company’s Whistleblowing Officer: Elle Hart (Snr Human Resources Manager) email: elle.hart@dumarey.com Tel: 07506702270
- where there are pressing reasons why this route is unsuitable, you contact the Managing Director, Tobias Knichel email: tobias.knichel@dumarey.com

We hope that staff will feel able to voice whistleblowing concerns openly under this Policy. Proper investigation may be difficult or impossible if we cannot obtain further information from you and it can often be difficult to establish if the allegations are credible.

Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect (formerly Public Concern at Work), the independent whistleblowing charity who offer a confidential helpline. Their contact details are at the end of this Policy.

Investigation and Outcome

Once you have raised your concern, it will be assessed to determine what initial action or further investigation should be taken. You will be told:

- who is handling the matter;
- how you contact them;
- whether your further assistance will be needed; and
- if you request it, a written summary of your concern and how it will be handled will be provided including the timescales within which you should expect a response, if this is possible.

The person appointed to deal with your allegation will be responsible for making a decision at the earliest opportunity on how they will progress with the allegation and must ensure that this is appropriately communicated and documented. They will also require to ensure that disclosures are logged, monitored and response time frames are provided to you.

Please note that it may not be possible to tell you the precise action taken if this could infringe a duty of confidence owed to someone else. The process will be as open as possible within these constraints.

Following the initial assessment, the Whistleblowing Officer may appoint a team/individual with relevant experience or specialist knowledge should further investigation be deemed necessary. You may be called upon to attend meetings in order to provide further information.

Whilst we cannot always guarantee the outcome you are seeking; the Company will try to deal with your concern fairly and in an appropriate way. By using this Policy, you can help achieve this.

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally, and we would encourage you to report such concerns internally first. The law recognises that in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, (if ever) be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone externally. Advice is available from the independent whistleblowing charity, Protect (formerly Public Concern at Work), who operate a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are:

- Protect Advice Line: 020 3117 2520
- website: www.pcaw.co.uk
- Online contact form: <https://protect-advice.org.uk/contact-protect-advice-line/>

Assurances

The Company is committed to this Policy. It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and

transparency, and will support staff who raise genuine concerns under this Policy even if they turn out to be mistaken.

Staff should not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Policy and Procedure.

However, if the Company concludes that a whistle-blower has made false allegations maliciously, or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

Any personal data processed under this policy will be processed in accordance with applicable data protection legislation and Dumarey Flybrid Limited's Data Protection Policy.

Responsibility for the Success of this Policy

The Whistleblowing Officer has day-to-day operational responsibility for this Policy and must ensure that all Managers and other staff who may deal with concerns or investigations under this Policy receive regular and appropriate training.

All staff are responsible for the success of this Policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

Related Documents

This Policy forms an essential part of Dumarey Flybrid Limited's overall policy framework and should be read in accordance with relevant related documents, including:

- Code of Conduct (Internal Document - Employee Handbook)
- Grievance Policy and Procedure (Internal Document - Employee Handbook)
- Data Privacy & GDPR Compliance Policy (External document – Published on Website)

Document Name	Owner / Changes made by:	Release date & Changes	Next Review
Whistleblowing Policy	E Hart - HR	Created 06/03/2023	Jan 2024
Whistleblowing Policy	E hart - HR	Dumarey rebrand & review 03/01/2024	Jan 2025