


<b>TEAM FUSION</b>	
<b>WHISTLEBLOWER POLICY</b>	
<b>COMPANY POLICIES</b>	

## 1. Introduction

Team Fusion are committed to conducting its business with honesty and integrity and expects all individuals working for or on behalf of Team Fusion at all levels and grades, whether permanent, fixed term or temporary and any other person who performs services for or on behalf of Team Fusion to maintain high standards in accordance with Team Fusion policies and procedures. 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 to prevent such situations from occurring or to ensure they are addressed in the most appropriate manner when they do occur.

The aims of this policy are:

- To encourage staff 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.
- To provide staff with guidance on how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- To encourage and enable suppliers (their contractors and employees) to report any suspicions about potential wrongdoing or malpractice on the part of Team Fusion or by suppliers carrying out work on behalf of Team Fusion.

## 2. Scope of the Policy


This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects employees from disclosing information about malpractice or wrongdoing they discover within the Company (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behaviour). Individuals are encouraged to report their concerns at the earliest opportunity so that they can be properly investigated.

This policy is intended to encourage all members of company staff, contractors and suppliers' contractors and employees to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution.

The procedure should not be used where there are issues of poor performance or a lack of professionalism; nor should it be used to resolve personal disputes. It should only be used where there is wrongdoing, whether done intentionally or not; this is not limited to but may include:

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- Breach of a legal requirement – e.g., health and safety obligation and/or an individual
- General malpractice – such as immoral, illegal or unethical conduct
- Gross Misconduct
- Breach of any of the Company’s Policies including the Company Statement of Expectations

It is not intended to replace existing procedures such as follows:

- If an individual has a concern relating to their own treatment as an employee, it should be raised under the existing grievance or harassment procedures
- If a client has a concern about services provided to him/her, it should be raised as a complaint to the Company

### 3. Who can raise a concern under this policy?


This policy applies to everyone who carries out work for the company in the UK or working for subsidiary companies overseas, including:

- Directors
- All employees
- Contractors and sub-contractors
- Consultants
- Suppliers, suppliers’ contractors and employees
- Work experience or other trainees

### 4 Raising a Concern

If anyone has any genuine concerns related to any of the above, they should report it under this policy by observing the following procedure:

1. The Whistleblower should promptly report the suspected or actual event to his/her manager. This can be done by telephone, in person or in writing. Suppliers’ contractors and employees may report any concerns they might have to the Chief Operating Officer for Team Fusion.
2. If the Whistleblower is uncomfortable or otherwise reluctant to report to his/her manager or designated point of contact, then they should report the event to the next highest or another level of management.
3. The Whistleblower can report the event with his /her identity or anonymously.
4. Whistleblowers will need to provide the following information:
  - a. The nature of their concern and why they believe it to be true
  - b. The background and history of the concern (giving relevant dates)
5. The Whistleblower shall receive no retaliation or retribution for a report that is provided in good faith and without malice to another or the organisation.
6. A Whistleblower who makes a report that is deliberately false will be subject to discipline, including termination, or other legal means necessary to protect the reputation of the organisation and members of its Board and staff.

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7. The Company will not tolerate any harassment or victimisation of a Whistleblower (including informal pressures) and will take appropriate measures to protect Whistleblowers who raise concerns in good faith. Any retaliation against the Whistleblower will be treated as a serious disciplinary offence and will be subject to formal disciplinary rules and procedures, potentially including termination of Board or employee status.
8. Crimes against person or property, such as assault, rape, burglary etc, should immediately be reported to local law enforcement personnel.
9. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
10. Unless there are any legal reasons why this cannot be done, Whistleblowers will be kept informed of the progress and outcome of any investigation.
11. If the investigation of a report that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency. If Whistleblowers do go on to raise concerns outside the Company they should not disclose information that is confidential to the Company or to anyone else, such as a client or contractor of the Company.
12. The Policy does not prevent individuals from taking their own legal advice.
13. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organisation are subject to subpoena.

#### 4. Support

Throughout this process:

- Individuals will be given full support from Team Fusion Senior Management;
- All concerns will be taken seriously;
- The Company will do all it can to help individuals throughout the investigation.

Compliance with these policies is mandatory for all Company personnel.



Jerry Jones  
Chief Executive Officer

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