

MIS GROUP

Whistleblowing Policy

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This document is reviewed annually.

1. What is Whistleblowing?

'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act within the MIS Group.

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Group's work to come forward and voice those concerns. Usually the concern will relate to some malpractice in the workplace and the whistleblower will not be directly or personally affected by such practice.

'Whistleblowing' is viewed by the MIS Group as a positive act that can make a valuable contribution to the company's efficiency and long-term success. It is not disloyal to colleagues or the Company to speak up. The Company is committed to achieving the highest possible standards of quality, probity, openness and accountability.

If you are considering raising a concern you should read this Policy first. It explains:

- the type of practices that are unacceptable
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what the Company will do.

2. What is the aim of the policy and when does it apply?

2.1 Aims of the Policy

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

2.2 Scope of the Policy

This Policy is intended to enable those who become aware of serious malpractice, to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Policy is not intended to replace existing procedures:

- Personal grievances (for example bullying, harassment, discrimination) are not covered by this whistleblowing policy, unless your particular case is in the public interest. These 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

2.3 Who can raise a concern under the Policy

The Policy applies to all:

- employees of the MIS Group and its trading subsidiaries
- independent contractors representing the MIS Group and/or its trading subsidiaries
- employees of suppliers working with the MIS Group and/or its trading subsidiaries

2.4 What should be reported

Any serious concerns that you have about service provision or the conduct of MIS Group employees, independent contractors, third party suppliers or others acting on behalf of the Company that:

- involve deliberate subversion of known standards;
- are not in keeping with the Group policies;
- fall below established standards of practice; or
- any improper behavior;
- criminal behavior;
- failing to comply with any legal obligation;
- illegal activity;
- possible fraud and corruption
- someone's health and safety is in danger
- risk of actual damage to the environment;
- unethical or immoral conduct.
- disclosures of personal data or sensitive information
- misuse of Company material

This list is not exhaustive and should be considered as indicative.

3. Protecting the whistleblower

3.1 Your legal rights

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for the Company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

3.2 Harassment or Victimisation

The MIS Group is committed to good practice and high standards and to being supportive of you as an employee.

The Company recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are 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.

The Company will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) 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 procedure.

3.3. Support to you

Throughout this process:

- you will be given full support from senior management
- your concerns will be taken seriously

3.4. 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.

3.5. Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult to give you feedback. Anonymous claims shall be reviewed on a case-by-case basis at the discretion of the Company with the following factors considered:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

3.6. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Company 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.

4. Raising a concern

4.1 Who should you raise your concerns with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns either with:

- Your Department Director, or
- Your Company Managing Director, or
- One of the Group Managing Directors

4.2. How to raise a concern

You may raise your concern by telephone, in person 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
- Details of the background and history of the concern (including relevant dates and any evidence you may have that substantiates your concern)

If you prefer, we are happy for you to come forward with another colleague or friend.

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the Company and there are reasonable grounds for your concern.

5. What the Company will do

The Company will acknowledge the concerns raised and respond to them as quickly as possible.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial careful and thorough enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Any subsequent investigation will be undertaken without prejudice and shall be strictly confidential.

6. Policy Owner

The Whistleblowing policy is the responsibility of the Whistleblowing Officer, Andrew McLaughlin.

The Deputy Whistleblowing Officer (Chris McLaughlin) may, from time to time, deputise in this capacity.

7. How the matter can be taken further

If you are not satisfied with the outcome of an investigation then you have the right to escalate to the Whistleblowing Officer. If the investigation pertains to the Whistleblowing Officer then the Deputy Whistleblowing Officer shall deputise.

8. Review of the Policy

The policy shall be reviewed annually and revisions shall be made available to all staff at all times.

9. Monitoring & Recording

The Whistleblowing Officer or Deputy Whistleblowing Officer shall record all instances of whistleblowing and review them annually as part of the policy review.