

WHISTLEBLOWING POLICY

NIRAS-LTS International (hereafter NIRAS-LTS) is committed to ensuring the highest standards of conduct in the delivery of services. Allegations on non-compliance with NIRAS-LTS Policies, and thus also with internationally accepted integrity standards, can be made internally in LTS by LTS staff or externally by outsiders who claim to have a suspicion or a proved case.

NIRAS-LTS is committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage. All NIRAS-LTS staff, permanent as well as project staff, are obliged to report any real or suspected incidents of corruption.

We also recognise the negative effect which malpractice can have on the organisation, and therefore encourage you to raise genuine concerns, or any suspicions you may have concerning misconduct.

1 Scope

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through the grievance procedure outlined in the Employee Handbook or within your contract.

This Policy applies to employees, and sub-contractors.

This Policy is non-contractual and may be amended by us at any time.

2 Responsibility

Responsibility for implementing this policy lies with the whistle-blower's Line Manager or Project Manager, and ultimately the Managing Director.

All of our workers will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this Policy. This Policy is made available to all employees and sub-contractors.

All managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any disclosure being made to them.

3 Principles

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

Should you feel you have been subjected to any detriment as a result of raising a concern under this Policy you should notify your Line Manager for employees or your Project Manager for sub-contractors.

You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity;
- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Abuse of vulnerable children or adults;
- Illegal labour practice constituting modern slavery;
- Bribery;
- Financial malpractice, impropriety or fraud;

- Attempts to conceal any of the above.

The malpractice can be past, present or prospective. It may have occurred inside or outside the United Kingdom.

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

3.1 Confidentiality and anonymity

Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

4 Process

Allegations should be made directly to Kimberly-Kerr@ltsi.co.uk.

4.1 Investigation

Once a concern has been raised, we will investigate this. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

4.2 UK Aid Direct Whistleblowing Hotline

For UK AID-funded projects, there is a UK Aid Direct whistleblowing hotline (+44 (0) 1355 843 747) which facilitates the reporting of possible illegal, unethical, or improper conduct when the normal channels of communication have proven ineffective or difficult. The hotline is available to be used by all DFID employees, as well as clients, Business Partners and others in a business relationship with UK Aid Direct. Please use this hotline to report corruption, fraud, human trafficking, slavery, safeguarding children and young people concerns, terrorism funding, and other violations related to UK Aid Direct, DFID staff and consultants, and programmes.

UK Aid Direct, consultants, contractors, suppliers, and associated person(s) involved in DFID funded business should immediately report any suspicions or allegations of aid diversion, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit at reportingconcerns@dfid.gov.uk or +44 (0) 1355 843 747.

4.3 Dissatisfaction with the outcome of the process

If you are dissatisfied with the outcome of the investigation, you should raise this with the Managing Director, giving the reasons for your dissatisfaction. He will respond in writing notifying you of his acceptance or rejection of the need for further investigation and the reasons for this.

4.4 Breach of this Policy

We may invoke the Disciplinary Procedure if you are found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled us in respect of any matter, breached this Policy in

any other way and/or if we believe that you have made a false allegation maliciously.

Patrick Abbot
Managing Director, NIRAS-LTS International

5th November 2020