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## **WHISTLE BLOWING POLICY**

### **Policy Statement & Procedure**

#### **POLICY**

FSD is committed to achieving and maintaining high standards with regard to behaviour at work, service to the public and in all its working practices. Workers are expected to conduct themselves with integrity, impartiality and honesty. FSD seeks to develop a culture where inappropriate behaviour at all levels is challenged. To achieve this FSD encourages the reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation.

We wish to fulfil our responsibilities to our shareholders, customers, employees, business partners and the wider community by seeking to conduct all aspects of our business at the highest level of excellence and professionalism and by operating in an ethical manner.

In order to meet these standards, we rely on the *integrity, teamwork, excellence* and *respect* of all employees, irrespective of level or status within the organisation, to point out ways in which we can improve the conduct of our business and make our decisions within a clear and ethical framework. So we want to encourage a culture of openness, allowing all staff (which includes all permanent and temporary staff plus all agency workers and sub-contractors) to raise and resolve any problems as quickly as possible.

We recognise that subcontractors may have their own procedures and we would like to encourage them to add to these procedures so as to enable their employees to report directly to us on our operations.

We will take prompt steps to investigate thoroughly and to remedy any deficiencies brought to our attention in accordance with this whistle blowing procedure. Just as it is the Company's duty to maintain standards, it is the obligation of all of us to bring malpractice or problems promptly to the Company's attention.

It is important to always remember that our reputation is a key business asset – indeed it is fundamental to our long-term success. It gives our customers, employees, partners, suppliers, investors and the community that we serve the confidence to trust us and do business with us.

If you are concerned that our code of conduct or any of our policies has been breached or that there has been an incident of malpractice in the workplace, please speak up. If you become aware that such malpractice is ongoing or may occur in the future, please speak up. Don't keep it to yourself or ignore it. We all have a duty to help maintain our high standards, and doing the right thing may mean reporting wrongdoings. You don't have to be right – you just have to believe the information you have is accurate.

Examples of potential malpractice are as follows:

- criminal offences including fraud or financial irregularity;
- breaching a legal obligation;
- a miscarriage of justice;
- putting someone's health and safety in danger;
- damaging the environment;
- intentionally concealing information relating to any of these matters.

These are examples only and you may become aware of other incidents of malpractice that you should tell us about under this policy. We encourage you to raise any concerns or questions you have in confidence, and we value the information that employees and others can provide. No-one's career will be adversely affected because they have done the right thing. We will not tolerate any retaliation or discrimination of any kind against anyone who has raised something in good faith.

If you believe you or anyone else is experiencing retaliation or discrimination, don't put up with it; report it at once. We regard any such behaviour as a serious matter and we will act against it and protect those who do the right thing. Conversely, if we discover that you have not informed us about malpractice you were aware of, that may be treated as a disciplinary issue.

If you are involved or implicated in the malpractice, we encourage you to inform us under the procedure. Your co-operation will be taken into account if disciplinary proceedings result.

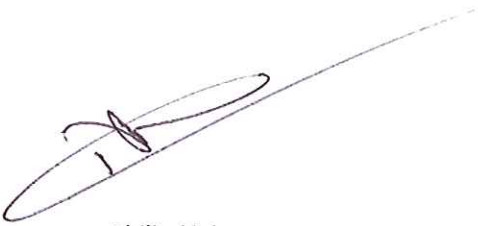
Anything you raise will be treated confidentially and communicated on a "need to know" basis only. If you prefer, you can raise concerns anonymously. All documentation relating to any disclosures or investigations will be kept on a secure basis and made available only on a "need to know" basis. In order to ensure clarity for the investigation, you will be asked to set out your concerns in writing.

We will follow up all concerns raised conscientiously, discreetly and without bias. Whenever possible whilst ensuring another person's right to confidentiality, we will report back to you.

## **PROCEDURE**

1. Suspicion of a serious violation of the Integrity Code should be reported to any director, including non-executive directors, if the breach relates to an executive director.
2. The person to whom the suspected violation is reported will record this report in writing and get the employee to sign it in agreement. Employees will receive a certified copy. There will be no written record if the employee objects to it.
3. The person to whom the employee reported the suspected violation will immediately commission an investigation.
4. Employees will be informed in writing within eight weeks of the time of making the report, of the steps which have been taken as a result of the report. If it is not possible to conclude matters within eight weeks, employees will be notified of the amended timescale.
5. The employees report will be kept confidential by the person to whom the employee reported the suspected violation, unless the employee expressly agrees to renounce anonymity.
6. If employees report a suspected violation, in observing the conditions of this policy, employee rights will be protected and employees will not be disadvantaged in any way as a result of making the report.

The Group Board has responsibility for policy implementation and this policy is signed by the Managing Director to demonstrate the Board's commitment.



Philip Haines

Managing Director