

Policy Statement

This policy applies to all employees and officers of the organisation. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are encouraged to use it. Employees are often the first to realise that something is wrong in the workplace but they may feel that they cannot express their concerns because it would be disloyal to their colleagues or to the company, or that they would be subjected to harassment or victimisation.

Frontier Smart Technologies encourages employees to raise their concerns about any malpractice at the earliest possible stage and this policy and procedure sets out the correct method for raising such concerns. Because circumstances differ this policy and procedure sets out general principles as to how matters should be dealt with but confers no contractual rights.

Frontier Smart Technologies encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Provided they follow the steps laid out in this policy and procedure, employees will be able to raise genuine concerns about malpractice within Frontier Smart Technologies without fear of harassment or victimisation.

Scope

This policy and procedures document covers Frontier Smart Technologies and is applicable to all employees.

Definition

For the purposes of this policy, Frontier Smart Technologies considers the following matters to be malpractice:

- The commission of a criminal offence;
- Contravention of the Bribery Act 2010;
- Failure to comply with a legal obligation;
- The occurrence of a miscarriage of justice;
- The endangerment of an individual's or group of individual's health and safety;
- The endangerment of the environment;
- The concealment of any information pointing to any of the above matters.

Appropriate Representatives for Disclosure

- Employees should initially discuss any concerns with their immediate manager or supervisor who will attempt to resolve the matter as promptly as reasonably practicable.
- If this is not appropriate or if the employee reasonably considers that the manager/supervisor has not dealt with the concern sufficiently or at all, the employee may then raise the concern with the next highest level of management.

- If the employee is still dissatisfied with the decision or action taken, they should contact the CFO who will either deal with the matter himself or designate an appropriate management representative.
- Any concerns will so far as reasonably practicable be dealt with in the strictest confidence at all times, although it must be recognized that in certain circumstances it will be difficult for the company to pursue a complaint or to tackle an alleged wrongdoer without the complainant's identity becoming known or to refrain from pursuing an issue raised by a complainant in order merely to respect his or her request for confidentiality.

Disclosure

The person hearing the complaint will arrange a confidential interview with the employee and may require the employee to detail the concern in writing beforehand. The concern will then be discussed in full at the interview and the person hearing the complaint will decide if any further action needs to be taken and if so, what. This may include requiring the employee to attend a further interview with a higher level of management and to provide any further evidence deemed necessary. A note of the decision will be provided to the employee and any such note is to be treated as strictly confidential by the employee.

Further Steps

- If the concern raised is found to be valid and is not already the subject of an internal investigation or legal proceedings, a decision will be taken by Frontier Smart Technologies as to how to proceed which may include referral of the matter:
 - to the Board of Directors with a view to internal investigation
 - to an appropriate external regulatory body for investigation
 - to the police
 - of the employee to the grievance procedure
 - The employee will be informed of any decision taken and the employee is required to keep this decision strictly confidential.

External Disclosure

- If the employee has followed this procedure and is genuinely and reasonably dissatisfied with the outcome, the employee may raise the concern confidentially with any appropriate regulatory authority, the police or a Member of Parliament. The employee must inform the original manager/supervisor/next highest level of management before taking this action.
- The employee may also take this action if they have reasonable grounds for belief that all of the management consulted are or were involved in the malpractice which they have alleged or that they will be subjected to a detriment if they raise the matter internally.
- The rules covering external disclosure do not apply for the purpose of taking confidential legal advice from a professionally qualified lawyer.

Protection from Victimisation

- The Company confirms that, provided the employee raises the concern about malpractice in accordance with the terms of this policy, in good faith and not out of any malice or with a view to personal gain and has reasonable grounds for the belief in the concern:
- so far as reasonably practicable, the employee’s identity will not be disclosed at any time, unless necessary for the purposes of the investigation or to comply with a legal obligation;
- the employee will not be subjected to any harassment, victimisation or disciplinary action as a result of raising the concern, provided he/she has complied in full with this policy;
- so far as reasonably practicable any supporting evidence relating to the concern will be kept secure at all times.
- If at any time it is discovered that the employee has raised a concern maliciously, not in good faith or with a view to personal gain or that he/she has breached the terms of this policy, the employee will lose the protection under this policy and will be subject to disciplinary action under the Group’s disciplinary procedure.

Document Control

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