



MCG Whistleblowing Policy

This document is approved and authorised for application within The MCG Group Holdings Ltd and all associated subsidiary companies.

Signed  Ford Garrard, CEO

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Purpose

This document sets out the policy for reporting concerns of malpractice or wrongdoing.

Introduction

The MCG Group is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.

We expect all staff to maintain the same high standards however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

We therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.

We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.

MCG predominantly operates within the UK and subject to the UK legislation pertaining to Whistleblowing. However, following the departure from the EU the introduction of the EU directive for Whistleblowing may also be applicable to our global businesses under the RPI group so we will operate a consistent approach across the global company and apply the best practices under the EU directive.

This policy does not form part of any contract and we reserve the right to amend this policy at any time without prior notice.

Who Can Raise a Concern Under this Policy

This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.

No qualifying length of service is required in order to raise a concern under this policy.

Under the EU directive this is also opened up to self-employed people, shareholders and board members (including non-executives), as well as "facilitators" (these are individuals connected to the whistle-blower in a work-context, such as colleagues and relatives, and legal entities associated with the whistle-blower

When to Use this Policy

This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed; or
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject; or
- that a miscarriage of justice has occurred, is occurring or is likely to occur; or
- that the health or safety of an individual has been, or is being or is likely to be endangered; or
- that the environment has been, is being or is likely to be damaged; or
- that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future
- The EU directive also states protection relates to breaches of EU law that fall within specified sectors (including public procurement, financial services, protection of privacy and data (amongst others))



- The EU and UK regimes are similar but whereas in the UK, the focus is on the subjective belief of the whistle-blower, the Directive focuses on whether the person had "reasonable grounds" to believe that there were grounds for a whistleblowing disclosure. In the UK, there is an additional element that the disclosure must be, in the reasonable belief of the whistleblower, in the public interest.

It doesn't matter if you are mistaken about your concern but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

Disclosures That Are Not Covered by This Policy

You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between the MCG Group and our lawyers regarding a specific case).

If your concern relates to your own treatment as an employee of the MCG Group, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

If your concern relates to your own treatment or personal circumstances at work but you are not an employee of the MCG Group, you should use our complaints procedure instead of the grievance procedure.

Our complaints policy is available on request or on MCG Central for MCG Group employees.

If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a client's activities you may need to raise the concern directly with the client instead.

Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints policy instead.

How to Raise a Concern

Under the new EU directive, as the MCG Group has more than 50 employees there is need to have a formal internal reporting channel.

If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance either

1. make a disclosure to your immediate superior.
2. Where internal employees there is a Misconduct Reporting icon on the MCG Central Welcome page (Freshdesk ticketing system with immediate alert that goes straight to the Legal and Compliance Team)
3. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.
4. Where agency workers do not feel able to report to their consultant, the MCG Group website hosts a Misconduct Reporting icon (Freshdesk ticketing system with immediate alert that goes straight to the Legal and Compliance Team)
5. Further each Group company website also hosts a Misconduct Reporting icon (Freshdesk ticketing system with immediate alert that goes straight to the Legal and Compliance Team)

All concerns raised will be acknowledged within 7 days and feedback will also be provided within a reasonable timescale not exceeding 3 months.

If, for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with the MCG Group HR Department.



If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with the person named above, you should raise the matter with the following member of management:

The MCG Group CEO.

A disclosure of a concern can be made by telephone, in person (upon request this must be facilitated) or in writing (including by email). However, it is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern.

You are not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum:

- the nature of the concern
- why you believe it to be true
- the background and history of the concern; and
- relevant dates where possible

Any concerns you raise in line with this policy will be recorded

You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

How We Respond to Concerns Raised Under This Policy

We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.

In the interests of full transparency, matters will be investigated at Group level by Group resources such as CEO, COO, HR Director and Legal & Compliance Director even if the matter is reported with a Group Company. All responses will be communicated from the Group Company in which the matter is raised. Whistleblowers must be notified as such as must approve this

We will take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts in order to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

You may bring a colleague (or trade union representative) to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time but will provide feedback within 3 months of raising the report.

We will keep you informed of the progress of the investigation as it is carried out and when it is completed, and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.



We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from

other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.

If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing. If you agree to this, you will be offered advice and support.

Confidentially

All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

Raising Your Concern Externally (Exceptional Cases)

The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action in order to resolve the issue.

However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510962/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. Public Concern at Work is a leading independent charity whose main objective is to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. ACAS also operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the information and contacts section below.

Protection and Support For Those Raising Concerns

We hope that all staff will feel able to voice their concerns freely under this policy.

The MCG Group is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform The MCG Group HR department immediately.

The MCG Group will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action and in some cases, will be liable to a claim for compensation brought against them personally.

To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.



If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our complaints procedure. Employees of the MCG Group can use our grievance procedure to address the issue instead.

Further Information and Contracts

If you have any queries about the application of this policy, please contact the MCG Group Legal & Compliance department in the first instance or raise a ticket on compliancehelp@themcgroup.com.

Public Concern at Work is a source of further information and advice. It also provides a free helpline offering confidential advice on 020 7404 6609. Further information is available on their website at www.pcaaw.co.uk.

The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 8pm and Saturday from 9am to 1pm. The website can be found here: www.acas.org.uk.

If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.