

WHISTLEBLOWING POLICY

Introduction

Inspectahire Instrument Company Ltd is committed to the highest standards of openness, probity, and accountability.

Inspectahire encourages employees and others working on behalf of the Company to raise genuine concerns about suspected wrongdoing or malpractice at the earliest opportunity. Individuals should be able to raise such concerns without fear of retaliation or detrimental treatment.

This policy provides a framework for raising concerns where an individual reasonably believes that wrongdoing has occurred, is occurring or is likely to occur. Concerns should normally be raised internally in the first instance so that they can be considered and, where appropriate, investigated.

The Public Interest Disclosure Act 1998 provides legal protection to qualifying workers who make certain protected disclosures in accordance with the legislation. Inspectahire will not subject an individual to detrimental treatment for raising a genuine concern in accordance with this policy.

This policy is intended for concerns about wrongdoing that are in the public interest. It is not intended to replace the Company's grievance, disciplinary, dignity at work or other employment procedures where the matter relates solely to an individual's personal employment circumstances.

Scope of Policy

This policy applies to employees, workers and others working on behalf of Inspectahire who wish to raise a genuine concern about suspected wrongdoing or malpractice that they reasonably believe is in the public interest.

These concerns may include:

- Criminal offences, including fraud, theft or other financial malpractice.
- Failure to comply with a legal or regulatory obligation.
- A miscarriage of justice.
- Danger to the health or safety of any individual.
- Damage or risk of damage to the environment.
- Bribery, corruption or other serious unethical conduct.
- Deliberate concealment of information relating to any of the above.

Safeguards

Protection

Inspectahire will not tolerate retaliation, victimisation or detrimental treatment of anyone who raises a genuine concern under this policy.

An individual does not need to prove that wrongdoing has occurred, but they should have a reasonable belief that the information disclosed indicates wrongdoing and that the concern is in the public interest.

Anyone who believes they have been subjected to detrimental treatment as a result of raising a concern should report this to a Director or other appropriate senior manager.

Confidentiality

Inspectahire will treat concerns raised under this policy sensitively and, as far as reasonably practicable, confidentially. Where an individual requests that their identity is kept confidential, every reasonable effort will be made to respect that request.

However, it may not always be possible to guarantee confidentiality, particularly where disclosure of an individual's identity is necessary to properly investigate the concern, comply with a legal obligation or allow another individual to respond to allegations made against them. Where practicable, this will be discussed with the individual raising the concern before their identity is disclosed.

Anonymous Concerns

Individuals are encouraged to identify themselves when raising a concern, as this can assist with investigation and allow the Company to seek further information or provide feedback. However, concerns raised anonymously will still be considered.

When considering an anonymous concern, the Company will take account of factors including:

- The seriousness and nature of the concern.
- The information and evidence available.
- The credibility of the concern.
- The ability to verify the information from other sources.

The Company will investigate an anonymous concern as far as reasonably practicable based on the information available.

Untrue Allegations

No action will be taken against an individual who raises a concern that they reasonably believe to be genuine, even where the concern is not confirmed following investigation. However, if an individual knowingly makes a false allegation or deliberately provides false or misleading information, the matter may be dealt with under the appropriate Company disciplinary or contractual arrangements.

Procedures for Raising a Concern

An individual should raise a concern as soon as reasonably practicable. Concerns may be raised verbally or in writing and should provide as much relevant information as possible, including the nature of the concern, when and where it occurred and any supporting information available.

Concerns should normally be raised with the individual's line manager or a Director. Where this is not appropriate, for example because the concern involves that person, the individual may raise the matter directly with another Director.

Alternatively, concerns may be raised with one of the following internal points of contact:

- Quality Assurance Manager
- Operations Administrator

The person receiving the concern will ensure that it is passed promptly to an appropriate person for consideration and, where necessary, investigation. No individual who is directly involved in the matter raised will be responsible for investigating that concern.

Where appropriate, the Company may appoint another senior manager or a suitably independent external person to investigate the concern.

Where a concern indicates possible criminal activity or another matter requiring referral to an external authority, the Company will consider whether the matter should be reported to the police, a regulator or other appropriate body. Any internal investigation will be managed so as not to prejudice an external investigation.

Timescales

Concerns raised under this policy will be acknowledged as soon as reasonably practicable and will be considered and investigated without unnecessary delay.

Due to the nature and complexity of whistleblowing concerns, it may not always be possible to specify how long an investigation will take. Where an investigation is likely to be prolonged, the individual who raised the concern will, where appropriate, be kept informed of progress.

On completion of the investigation, the individual will be advised, where appropriate, that the matter has been concluded and provided with relevant information about the outcome. The Company may not be able to provide full details where this would breach confidentiality, data protection requirements or the rights of another individual. Communications relating to whistleblowing concerns will be handled securely and confidentially.

Investigating Procedure

The nature and extent of any investigation will depend on the circumstances and seriousness of the concern raised. The person appointed to investigate will act fairly, objectively and, as far as reasonably practicable, independently of the matter concerned.

The investigation may include:

- Obtaining further information and clarification from the individual who raised the concern.
- Reviewing relevant records, documents or other available evidence.
- Speaking with individuals who may have relevant information.
- Providing any person who is the subject of an allegation with an appropriate opportunity to respond, where and when it is appropriate to do so.
- Seeking specialist, legal or external advice where necessary.
- Considering whether the matter should be referred to an appropriate external authority.

The findings of the investigation will be documented as appropriate and reported to the Managing Director or another appropriate Director where the Managing Director is involved in, or has a conflict of interest relating to, the matter.

Where a concern is substantiated, the Company will determine the appropriate action. This may include corrective action, changes to Company procedures, disciplinary action or referral to an appropriate external authority.

The individual who raised the concern will be kept informed as appropriate, subject to confidentiality, data protection and the rights of others.

Further Escalation and External Disclosures

If an individual believes that their concern has not been appropriately addressed, they may raise the matter with the Managing Director or another Director where the Managing Director is involved in the concern.

Inspectahire encourages concerns to be raised internally where appropriate so that they can be investigated and addressed. However, individuals may have the legal right to make a protected disclosure to an appropriate external prescribed person or body in certain circumstances. Examples may include the Health and Safety Executive, the Environment Agency, the Scottish Environment Protection Agency or another regulator relevant to the matter being raised.

Individuals considering making an external disclosure may wish to seek independent advice to ensure that the disclosure is made through an appropriate route and qualifies for legal protection. Details of prescribed persons and bodies are available through the United Kingdom Government website. Independent advice on whistleblowing may also be obtained from Protect, the United Kingdom's independent whistleblowing charity.

Authorised by:



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Name: Cailean Forrester

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Final Audit Report

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