

I. Whistle Blowing

Definition of Whistle Blowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity
- A miscarriage of justice
- Danger to health and safety
- Damage to the environment
- Bribery or corruption
- Financial fraud or mismanagement
- Negligence
- Breach of our internal policies and procedures
- Conduct likely to damage our reputation
- Unauthorized disclosure of confidential information
- The deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. If a MTSH representative has any genuine concerns related to suspected wrongdoing or danger in relation to any of activities (a whistleblowing concern) they should report it under this policy.

i) Raising a concern

All MTSH representatives expected to report any concerns of issues covered by this policy and to cooperate with any investigation of such concerns. The whistle-blower does not have to be certain of the occurrence of an issue of concern, but they should raise a concern as detailed below. It follows that the whistle-blower is not expected to investigate the suspicions, only raise them

ii) Confidentiality

All matters raised under this policy will be dealt with confidentially, however it should be noted that the MTSH cannot guarantee confidentiality as there may be legal requirements to disclose information relating to a matter raised. Furthermore, MTSH cannot prevent the identity of a person raising an issue being deduced by others.

iii) Protection

Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If an employee believes they have suffered any such treatment, they should inform Senior Executive immediately.

iv) Whistleblowing Policy

As an employee, individuals must not threaten or retaliate against anyone who raises a concern under this policy. If an employee is involved in such conduct, they will be subject to disciplinary action. MTSH will not tolerate any adverse consequences affecting a person raising a concern under this policy.

MTSH encourages employees to report their concerns, however MTSH also recognizes the opportunity this policy provides for the malicious reporting of false concerns. MTSH has a duty to protect employees from malicious false allegations and will treat malicious concerns raised under this policy as a serious breach of the Code of Conduct Policy. Employees who deliberately raise false concerns may face disciplinary action.

v) Investigation and Outcome

Once a concern has been raised MTSH will carry out an initial assessment to determine the scope of any investigation. The investigating team will offer to inform the whistle-blower the outcome of our assessment. The whistle-blower may be asked to attend additional meetings in order to provide further information.

MTSH will aim to keep all parties informed of the progress of the investigation and the likely timescale. The need for confidentiality may prevent MTSH providing specific details of the investigation, or any disciplinary action taken as a result. All parties must treat any information about the investigation as confidential.

vi) Record Keeping and Review

Those who receive concerns raised under this policy will record, as a minimum, the following information:

- Date and time of receipt of the concern
- The identity of the person raising the concern (if known)
- A summary of the concern, its background and other relevant information
- Whether confidentiality was requested, explained, or promised
- Whether the concern was raised elsewhere; if so where, to whom and when any advice or feedback given to the person raising the concern
- Details of any investigation undertaken and its result.