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1 General information & responsibilities

Purpose:	Policy and procedure for all Lindner UK Group companies in relation to Whistleblowing
Scope:	Lindner UK Group (Lindner Prater Ltd, Lindner Interiors Ltd)
Main contact:	Benjamin Garwood – HR Manager

2 Introduction

This document clearly sets out all procedures regarding Whistleblowing within the Lindner UK Group. It applies to any person working at or joining Lindner Prater Ltd or Lindner Interiors Ltd.

This policy also applies to:

- Employees of contractors working for Lindner UK Group
- Employees of suppliers to the Lindner UK Group
- Those providing services under a contract or other agreement with the Lindner UK Group
- General public

For employees, this policy does not form part of the contract of employment. It will be reviewed, updated and amended from time to time in consultation with any employees representative body. Whenever possible, current employees will be updated on relevant legislation.

The master document is stored in accordance with Lindner Prater Ltd procedure Control of records & documents LPR-VA-QM-001 and made available to all Lindner UK Group employees through their management systems on i.net or on Nexus.

3 Procedural Instruction

The purpose of this procedure is to provide a framework and guidance on the application of the Company's Whistleblowing policy and the use of the Lindner Group Whistleblowing system "iWhistle" that can be accessed via the company's website.

4 Types of complaints

All individuals raising a whistleblowing complaint are encouraged to follow this procedure if they have a concern about any of the following:

- wrong-doing at work, including any criminal offence
- a failure to comply with legal obligations
- a miscarriage of justice
- a health and safety danger
- an environmental risk or
- a concealment of any of these

This list is not exhaustive but indicates the types of concerns that should be raised:

- misuse of assets (including stores, equipment, vehicles, buildings, computer hardware and software)
- failure to comply with appropriate professional standards
- bribery, corruption or fraud including the receiving or giving of gifts or hospitality in breach of our procedures
- falsifying records
- failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income to the business or would otherwise seriously prejudice the business
- abuse of authority
- using the power and authority of Lindner UK Group for any unauthorised or ulterior purpose
- causing damage to the environment

5 Submitting a whistleblowing case

The whistleblower does not have to be able to prove the allegations, but should have a reasonable and genuine belief that the information being disclosed is true; some allegations may prove to be unfounded, but we would prefer the issue or concern to be raised, rather than run the risk of not detecting a problem.

If appropriate, the whistleblower should discuss the matter with a manager of the business in the first instance. However, should he/she prefer (perhaps because a manager is unavailable, or indeed might be the cause of the concern) can raise a concern directly via the "iWhistle" system.

6 Confidentiality

When submitting a case either directly to the HR team or via "iWhistle" the identity of the whistleblower will be treated with the upmost confidentiality. Whistleblowing cases can be submitted anonymously via the "iWhistle" system.

Where the whistleblowing complaint includes the identity of the whistleblower, the Lindner UK Group will respect (so far as we can legally) the confidentiality of any whistleblowing complaint received, but cannot guarantee that the investigation process will not result in colleagues speculating on the identity of the

whistleblower. It must be appreciated that it will be easier to follow up and to verify complaints if the whistleblower is prepared to give his/her name, and unsupported anonymous complaints and allegations are much less powerful and therefore will be treated with caution.

7 Whistleblower Protection

The whistleblower is protected by law under the Public Interest Disclosure Act (PIDA) 1998. In relation to employees of the Lindner UK Group, the business undertakes that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result. If any employee feels that he/she is being subjected to a detriment by any person within the business as a result of his/her decision to invoke this procedure, he/she must inform one of the HR team immediately and appropriate action will be taken to protect him/her from any reprisals.

8 Principles for internal investigations

Lindner UK Group commit to responding to your concerns as quickly as possible. The overriding principle for Lindner UK Group will be the public interest. In order for the business to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and what form the investigation should take.

An investigation may need to be conducted under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so.

Where appropriate the matters raised may:

- Be investigated by management, Lindner Group Internal Audit the HR team or through the disciplinary/grievance procedure
- Be referred to the police

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- Acknowledging that the concern has been received
- Indicating how Lindner UK Group proposes to deal with the matter
- Provision of support mechanisms
- Providing detail on whether further investigations will take place and if not, why not.

All evaluations that are necessary to check the facts will be carried out in compliance with the "General agreement on information technology systems, data protection and data security".

9 Access to the iWhistle system

In order to protect the identity of the whistleblower and to ensure confidentiality of the whistleblower and their claim, the data within the "iWhistle" system can only be accessed by the Lindner Group Internal Audit team and the appropriate Managing Director (Lindner Interiors, Lindner Prater).

Two way communication is possible through a portal via the encrypted site, allowing for the whistleblower to obtain updates whilst continuing to protect their identity and need for confidentiality.

10 False claims

Should it become clear that the procedure has not been invoked in good faith (for example for malicious reasons or to pursue a personal grudge against another employee), this will constitute misconduct and will be dealt with through our disciplinary procedure.

11 Personal Data

Personal data will be managed and processed in line with the “General agreement on information technology systems, data protection and data security”. This includes personal data of those involved (whistleblowers, any named witnesses, any named suspects).

12 Further information

If you require further information in relation to this policy or procedure please contact a member of the HR team.

13 Review of policy

This policy is subject to review from time to time in consultation with any employees’ representative bodies.

14 Related documents and revision history

14.1 Related documents

- Grievance policy and procedure LUK-VA-HR-010
- Disciplinary policy and procedure LUK-VA-HR-012

Revision history

Rev.	Date	Changes	Editor	Approved by
00	19.05.2021	First issue	A.Novo	B.Garwood
01	25.05.2022	Main contact updated	L.Pole	B.Garwood
02	22.07.2022	Updated and inclusion of iWhistle system	B.Garwood	G.Hamblett