



Sellafield Ltd

Sellafield Ltd Company Policy

SLCP 4.01.01

Issue 3

Effective date 05/2017

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This Sellafield Ltd Policy is approved by the SL Board; it represents the SL Board's direction to the business on this topic. Compliance with this policy is mandatory through aligning Sellafield Ltd Management System processes and people behaviours to the commitments below.

Reporting of Concerns ('Whistleblowing') Policy

Policy Statement

Sellafield Ltd will conduct its business safely, responsibly, openly and with integrity at all times. It will ensure that workers on its premises are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that matters will be investigated appropriately and regarded as confidential. It will not tolerate victimisation, retaliation or discrimination against employees who raise concerns in good faith even if they turn out to be mistaken.

Commitments

We shall be a Company that:

- Encourages a culture of openness and accountability.
- Expects workers to maintain high standards and ethical behaviours in accordance with our requirements as set out in our Code of Responsible Business Conduct, our Employee Terms and Conditions and our Sellafield Ltd Policies.
- Complies as a minimum with the Employment Rights Act 1996, Public Interest Disclosure Act 1998, the Enterprise Regulatory Reform Act 2013 and the Bribery Act 2010.
- Protects employees who raise issues under this policy from any detriment or unfair dismissal as a result of any such disclosure.
- Positively encourages all workers to ensure that they take steps to disclose any practices, or deliberate concealment of practices, that are or may be: a danger to health and safety or the environment; criminal activity; bribery or financial mismanagement; breach of company policy, or conduct that may compromise security or our reputation, of which they become aware.
- Ensures that concerns relating to suspected fraud, bribery or corruption are investigated or overseen by Internal Audit, in line with the company's Fraud Prevention and Anti-Bribery and Corruption Policy.
- Provides a confidential reporting facility for employees and others, set up specifically for this purpose.
- Seeks to maintain confidentiality and, if requested, anonymity except where the nature of the disclosure means that this is either impracticable or impossible.
- Provides feedback to those who raise concerns, except where the nature of the concern means that confidentiality may prevent us from giving specific details of investigations or actions being taken.
- Provides support to employees who believe they are being victimised, retaliated against or threatened as a result of raising a concern.
- Takes disciplinary action against employees who threaten, bully, victimise, harass or retaliate against any employee who has raised or intended to raise a concern in good faith.