



# VISVIRA LIMITED

## WHISTLE BLOWING POLICY

Dated January 2024



## Whistle Blowing Policy

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## Policy Statement

### Purpose and Scope

VisVira is committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.

We also recognise the negative effect which malpractice can have on the organisation and therefore encourage you to raise genuine concerns or any suspicions you may have concerning misconduct.

This policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature, it should be pursued through the Grievance Procedure. Complaints relating to discrimination, victimisation or harassment should be dealt with through the Grievance Procedure and/or the Equal Opportunity Policy.

This Policy applies to full and part-time workers and contractors home workers and agency workers, except if they are genuinely self-employed.

This Policy is non-contractual and may be amended by us at anytime.

### Protection

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

Should you feel you have been subjected to any detriment as a result of raising a concern under this Policy, you should notify the HR Manager or your Line Manager.

### Disclosures under this Policy

You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice.

Criminal activity

Miscarriages of Justice

Practices endangering health and safety

Practices damaging the environment

Failure to comply with a legal obligation

## Bribery

Financial malpractice, impropriety or fraud

Serious failure to comply with any codes of practice or ethical rules covering the business

Attempts to conceal any of the above.

The malpractice can be past present or prospective. It may have occurred inside or outside the United Kingdom

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns, even if the concern you raised is not confirmed by any subsequent investigation.

## Confidentiality and anonymity

Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

## How to make a disclosure

In the first instance you should bring the matter to the attention of your line manager, who will inform a director. If the disclosure allegations are about your line manager or the malpractice occurs at this level, you may make the disclosure directly to the Directors.

## Investigation

Once a concern has been raised, we will investigate it. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of the this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate, bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we considered this appropriate.

## Dissatisfaction with the outcome of the process

If you are dissatisfied with the outcome of the investigation, you should raise this with the Directors, giving the reasons for the dissatisfaction. They will respond in writing notifying you of their acceptance or rejection of the need for further investigation and the reason for this.

## Training

All of our workers will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this Policy. This Policy will be made available to all employees via the Employee handbook.

All managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any disclosure being made to them.

## Breach of this Policy

We may invoke the Disciplinary Procedure if you are found to have subject a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled us in respect of any matter, breached in this Policy in any other way and/or if we believe that you have made a false allegation maliciously.

Signature:

Name

Position:

Date Signed



Andrea Jones

Director VisVira Ltd

24-01-24

## If in doubt

Questions should be directed to VisVira Limited by emailing [hello@visvira.ai](mailto:hello@visvira.ai)