

Whistleblowing Policy

Policy Statement

Durbin PLC is committed to achieving and maintaining the highest possible standards with regard to behaviour at work, services to the public and in all of our practices. Employees are expected to conduct themselves with integrity, impartiality and honesty. Durbin PLC sees our Anonymous Suggestions System as a key component in our strategy to challenge inappropriate behaviour at all levels in the organisation. It is both an instrument in support of good governance and a manifestation of a more healthy and ethical organisational culture.

This system applies to all employees and also applies to Board Members, agency staff, and trainees on work experience and will be made readily available and accessible through the Company intranet.

What is 'Whistleblowing'

Whistleblowing is the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrong-doing which affects others. The aim of this policy is to set out a procedure through which employees and third parties can report their concerns without fear of reprisal.

Aim

Durbin PLC encourages employees to feel confident in raising serious concerns at an early stage and to question and act upon concerns about practice. It is important that any criminal behaviour or any other wrongdoing by any employee, or individual undertaking work with Durbin PLC, is reported and dealt with by either reporting the concern to a manager or via the Company Anonymous Suggestions System.

The Anonymous Suggestions System is intended to build confidence and enable employees to raise serious concerns within Durbin PLC in an anonymous manner if they so wish.

Scope

This policy is in place to reassure employees that it is safe and acceptable to speak up and enable concerns to be raised at an early stage and in the right way. Rather than wait for proof, we would prefer employees to raise the matter when it is still a concern.

If the following matters are either happening now, have happened, or are likely to happen employees can report it through our Anonymous Suggestions System on the Company Intranet:

- Criminal activity – such as drug taking, theft or fraud.
- Illegal activity – such as failure to pay the minimum wage or giving or receiving a bribe.
- A miscarriage of justice – such as an employee falsely alleging wrongdoing by another employee.
- Deliberate breach of the Company policies.
- Danger to the health and safety of any person.
- Damage to the environment.
- Unethical or improper conduct.
- Attempts to conceal any of the above.

What is not considered as whistleblowing

Concerns that are not of a public interest nature or which fall into an area covered by another procedure will not be considered under this whistleblowing procedure such as:

- Employee complaints about their employment which are dealt with through our grievance procedure.
- Bullying or harassment.

Procedure

If you honestly believe, or have a reasonable suspicion, that wrongdoing is occurring, or is likely to occur, you can always report your concerns directly to any senior manager or if you prefer through our Anonymous Suggestions System on the Company Intranet.

How to raise a concern:

Step 1:

Inform your line manager, HR or senior manager.

Step 2:

The manager will acknowledge the complaint and pass it on to HR or a senior manager as appropriate.

Step 3:

HR or a senior manager will acknowledge in writing within 10 days with the intended course of action.

Step 4:

The information you give will be considered carefully and a decision will be made as to whether there are grounds for further investigation.

Step 5:

If the decision is to proceed with further investigations then a member of the management team will contact you to instigate the process.

Confidentiality

All concerns will be treated confidentially and every effort will be made to protect an employee's identity. However, there will be circumstances in which due the nature of the investigation, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary, legal investigations or proceedings.

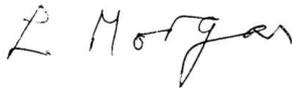
Employees who raise concerns in good faith under this procedure will not be dismissed or subjected to any detriment as a result of their disclosure.

Monitoring & review the policy

This will be reviewed annually by senior management. The next review will take place by January 2019.

Board approval

This statement has been approved by the Company's board of directors and signed by the Chief Executive Officer, who will ensure it is reviewed annually and published.

A handwritten signature in black ink that reads "L Morgan". The signature is written in a cursive style with a large initial "L" and a stylized "Morgan".

Leslie Morgan
CEO
Durbin PLC

Date: 1st January 2018