**1. Purpose**

This policy aims to encourage and enable employees and others working with NWF Facilities Ltd to raise serious concerns about wrongdoing without fear of retaliation. It ensures that concerns are handled promptly, fairly, and confidentially in accordance with the **Public Interest Disclosure Act 1998** and best practices for ethical governance and sustainability.

**2. Scope**

This policy applies to all employees, contractors, agency workers, suppliers, and third-party partners of NWF Facilities Ltd. It covers concerns relating to:

* Criminal offences or illegal acts
* Health and safety risks
* Environmental damage or climate violations
* Breach of legal or regulatory obligations
* Bribery, fraud, or corruption
* Abuse or neglect
* Any other conduct contrary to the values and policies of NWF Facilities Ltd

**3. Policy Statement**

NWF Facilities Ltd is committed to the highest standards of honesty, integrity, accountability, and environmental responsibility. We encourage all individuals to raise concerns at the earliest opportunity so that they can be investigated and resolved appropriately.

We will:

* Treat all concerns seriously and sensitively
* Protect whistleblowers from victimisation or retaliation
* Investigate concerns fairly and objectively
* Maintain confidentiality wherever possible
* Take appropriate action where misconduct is identified
* Apply whistleblowing protections to climate-related concerns or breaches of environmental law or commitments

**4. What to Report**

You should report any concerns that you reasonably believe indicate wrongdoing, including but not limited to:

* Fraud, theft, or misuse of funds
* Health and safety breaches, especially those placing people at risk
* Environmental breaches (e.g. illegal waste disposal, pollution)
* Unsafe working conditions or practices that contradict climate action goals
* Harassment, abuse, or discrimination
* Concealment of any wrongdoing

**5. How to Raise a Concern**

Concerns can be raised by:

* Speaking to your **line manager or supervisor**
* Contacting a **relevant manager** or **designated whistleblowing officer**
* Reporting via the company’s **whistleblowing email** or confidential reporting mechanism

Reports should include:

* A description of the concern
* Relevant names, dates, places, and supporting evidence (if available)
* Whether the issue has been reported elsewhere

Anonymous reports will be accepted, although they may be harder to investigate fully.

**6. Investigation Proces**

Upon receiving a concern:

1. An initial assessment will be made to determine the scope and urgency
2. An investigation will be launched, led by the designated officer or appropriate manager
3. The whistleblower may be contacted for clarification or additional information
4. A conclusion will be reached, and if wrongdoing is identified, appropriate corrective or disciplinary action will be taken
5. Feedback will be provided to the whistleblower (where possible)

All investigations will be handled sensitively and confidentially.

**7. Protection for Whistleblowers**

NWF Facilities Ltd strictly prohibits retaliation against anyone who raises a concern in good faith. This includes:

* Dismissal or demotion
* Harassment or victimisation
* Loss of opportunities or discrimination

Any retaliation will itself be treated as a disciplinary offence.

**8. Climate Change and Sustainability Considerations**

In alignment with our **ISO 14001** and **climate change commitments**, NWF Facilities Ltd recognises that whistleblowing is a vital tool in identifying:

* Breaches of environmental permits
* Unsafe environmental practices
* Greenwashing or misreporting sustainability performance
* Violations of our Net Zero or carbon reduction commitments

We treat environmental whistleblowing as seriously as financial or legal misconduct.

**9. Training and Awareness**

* All employees will receive training on this policy during induction
* Regular refresher training will reinforce awareness of reporting channels and protections
* Managers will be trained in how to handle disclosures professionally and lawfully

**10. Monitoring and Review**

* Whistleblowing data will be reviewed annually to identify trends and opportunities for improvement
* This policy will be reviewed every 12 months or following legislative or organisational changes
* Updates will be communicated through internal channels and staff briefings

**Signed:**  
[Director’s Name]  
Managing Director  
NWF Facilities Ltd  
**Date:** 01.02.2025