

ITDS Group of Companies  
Whistleblowing Policy

## 1. Introduction

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

The ITDS Group of Companies ("the Company") (see Appendix 1 for details), is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption.

## 2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

- 2.1 That a criminal offence has been committed, is being committed or is likely to be committed.
- 2.2 That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- 2.3 That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- 2.4 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 2.5 That the environment, has been, is being, or is likely to be, damaged.
- 2.6 That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- 2.7 That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.
- 2.8 That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

they must use the Company's disclosure procedure as set out below.

## 3. Disclosure Procedure

- 3.1 Information which an employee reasonably believes tends to show one or more of the above should promptly be disclosed to the Operations Manager so that any appropriate action can be taken.
- 3.2 If it is inappropriate to make such a disclosure to the manager, the employee should speak to their Line Manager.

- 3.3 Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.
- 3.4 However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'
- 3.5 For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to the Operations Manager.

#### Appendix 1

The ITDS Group of Companies comprises

Name	Country of Registration	Company Number	Registered Office
ITDS Group Holdings Ltd	UK	10062061	The Old Casino, 28 Fourth Avenue, Hove, East Sussex, England, BN3 2PJ
IT Document Solutions Ltd	UK	08939264	The Old Casino, 28 Fourth Avenue, Hove, East Sussex, England, BN3 2PJ
ITDS Managed Services Ltd	UK	12887375	The Old Casino, 28 Fourth Avenue, Hove, East Sussex, England, BN3 2PJ
ITDS Mailroom Solutions Ltd	UK	10549547	The Old Casino, 28 Fourth Avenue, Hove, East Sussex, England, BN3 2PJ
ITDS Ultimate Space Ltd	UK	11522645	The Old Casino, 28 Fourth Avenue, Hove, East Sussex, England, BN3 2PJ