CAPITAL SKY LTD.

Whistleblowing Policy

This Whistleblowing policy is underpinned by the Public Interest Disclosure Act 1998 (known as the Whistle-blower's Act). The law provides legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The organisation is committed to ensuring that no member of staff should feel at a disadvantage in raising legitimate concerns. This policy only applies when you report something which is in the public interest. You must reasonably believe it to be so because it concerns:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

The organisation will treat all such disclosures in a confidential and sensitive manner. The identity of the employee making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

If an employee has a concern, initially they should first raise it with their line manager, verbally or in writing. If you are unsure whether to raise the matter, you can talk confidentially with that person. If they feel that this person may be involved of if they do not wish to approach them, they should approach a more senior level of Management or a Director.

The organisation Capital Sky will investigate the matter and personnel will be kept advised of the progress.

In all cases, the employee is encouraged to exhaust Capital Sky's internal procedures before contacting external sources such as the Health & Safety Executive, Environment Agency etc.

Signature

Martin Maloney
Managing Director

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