



# Whistleblowing Policy

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### Version control

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## About this policy

The Whistleblowing Policy sets out the framework for how Cambridge Energy and its employees should be dealing with allegations of illegal and improper conduct.

CE is committed to the highest standards of transparency, probity, integrity and accountability.

This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the interest of CE to do so without a risk for the employee of being victimised, discriminated against or disadvantaged.

CE recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to the company and/or to those for whom CE or they are providing a service.

CE will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

The Head of Compliance have overall responsibility for the operation of this policy and for determining the administrative processes to be followed and the format of the records to be kept.

## Scope

This policy applies to all CE employees, as well as consultants and contractors.

This policy applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Other unethical conduct

## Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. However, if the matter is subsequently dealt with through other CE procedures then the identity of the whistleblower may have to be revealed.

Similarly, if the allegation results in court proceedings, then the whistleblower may have to give evidence in open court if the case is to be successful.

CE will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

## Anonymous Allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the CEO.

In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

## Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation.

However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

## Procedure for making an allegation

It is preferable for allegations to be made to an employee's immediate manager to whom they report.

However, depending on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice, the whistleblower may also make an allegation directly to any of the following:

- The CEO
- Head of Compliance
- The Chairman of the Board of Directors

On receipt of a complaint of malpractice, the person who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will as a general rule be investigated by the appropriate line manager.
- If the complaint is against a line manager or is in any way related to the actions of a line manager, the complaint should be passed to the CEO or Head of Compliance for referral.
- In the case of a complaint involving the CEO or Head of Compliance, the case should be passed to the chairman of the Board who will nominate an external party to act as the alternative investigating officer.

If there is evidence of criminal activity, then the investigating officer should inform the police. CE will ensure that any internal investigation does not hinder a formal police investigation.

## Action on receipt of an Allegation

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependant on the circumstances of the complaint an alternative representative may be allowed e.g. the individual's legal representative.
- The investigating officer should consider the involvement of CE auditors and the police and should consult with the CEO or Head of Compliance as appropriate.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the CEO or Head of Compliance as appropriate.
- The CEO or Head of Compliance will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate company procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of the company procedures.

If the whistleblower is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the CEO or Head of Compliance or Chairman.

## Timetable

The person making the allegations will receive an acknowledgement in writing within 10 working days with:

- An indication of how the company propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Information on whistleblower support mechanisms
- Indication whether further investigations will take place and if not, why not

## Support

CE will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings the company will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

CE accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

## Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Board.

The CEO will report to the Board on any whistleblowing allegations made during the period since the previous meeting. The reporting will be in a form which does not identify whistleblowers.



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