**Global Parametrics**

*General Whistleblowing Policy*

**Whistleblowing**

Global Parametrics (the **Company** and here including reference to all members of the Global Parametrics group of companies) is committed to the highest possible standards of conduct, openness, honesty and accountability and takes seriously any issues of malpractice or wrongdoing. The Company encourages a free and open culture in its dealings with all who are engaged or impacted directly or indirectly by its activities. In particular the Company recognises that effective and honest communication is essential if any concerns about breaches, failures or shortcomings are to be effectively dealt with.

As such, the Company wishes to be informed of any evidence or genuine belief held in good faith that any issues of fraud, malpractice, corruption or wrongdoing have occurred, are occurring or are likely to occur. In particular, but without limitation, the Company wishes to be informed if the following set of circumstances is occurring, has occurred or may occur in respect of the Company or its activities:

* a criminal offence has been committed, is being committed or is likely to be committed;
* a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
* a miscarriage of justice has occurred, is occurring or is likely to occur;
* the health and safety of any individual has been, is being or is likely to be endangered;
* the environment has been, is being or is likely to be damaged;
* information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

**Who can make a whistleblowing report?**

A report may be submitted by an individual or group directly or materially affected, or potentially directly or materially affected, by the operations or activities of the Company.

A report can also be submitted by:

* an individual or group authorised to act on behalf of the whistleblower(s); or
* individuals or registered non-governmental organisations (NGO) with evidence of any of the circumstances set out above or with specific expertise in the topic to which the report refers. This may be particularly relevant in the case of environmental issues where the impact may primarily be on biodiversity rather than on people.

The Company’s HR policies and procedures include a specific whistleblowing procedure applicable to employees (whether permanent or temporary), agency workers, contractors and their staff, suppliers and those providing services under a contract within the Company in their own premises.

 **What type of report will the Company not accept?**

The Company will not investigate (as determined by the Company in its absolute discretion):

* frivolous or malicious complaints;
* complaints motivated by an intention to obtain commercial, financial, personal, political or other advantage, not directly related to the nature of the complaint;
* complaints filed after the Company is not longer involved or engaged in the relevant business, activity or project to which the complaint relates (in such circumstances the Company’s ability to resolve a situation it likely to be very limited – however if we are able to contact the relevant people who are still so involved or engaged to inform them that the issue has been raised, we shall endeavour to do so and consider what other steps could be taken);
* issues which the Company: has either previously reviewed (in the context of a complaint under this whistleblowing procedure or otherwise); has made a recommendation; or has reached a decision, unless justified by clear and compelling new evidence or circumstances not known at the time; or
* complaints or queries relating to the adequacy or suitability of the Company’s own policies and procedures.

**How to file a whistleblower report**

Whistleblower reports can be made by email to the following dedicated email address whistleblowing@globalparametrics.com.

The Company will conduct the investigation of any such reports and will seek to progress them as quickly as possible. It would be helpful to provide the background and history of the relevant matter (giving relevant dates, names and locations where possible), the reasons for the particular concern about the situation and details of evidence/witnesses. We will, in so far as we are able, keep any person submitting a report (“**you**”) informed of our investigations. Once any investigation by the Company is concluded, you will be provided with a summary of the outcome in so far as we are permitted to do so by law and/or confidentiality obligations.

Reports raised anonymously will be considered at the discretion of the Company taking into account the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.