Whistleblowing Policy & Procedure

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End User: MAST STAFF

1 Policy

It is the policy of Maritime Asset Security & Training (MAST) Ltd to encourage workers to raise genuine concerns about malpractice at the earliest possible stage in the right way.

2 Scope

This policy covers all MAST employees, consultants, temporary and agency workers, and anyone on a contract for services.

3 Objectives

- To support the current legal requirements of the Public Interest Disclosure Act 1998
- To support the MAST values.
- To ensure employees can raise concerns without fear of suffering retribution.
- To provide a clear and confidential procedure.

4 Principles

- Any concerns raised will be treated fairly and properly.
- We will not tolerate the harassment or victimization of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity unless they agree otherwise.
- We will ensure that the individual raising the concern is aware of who is handling the matter.

- We will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. We do not however extend this assurance to someone who maliciously raises a matter they know to be untrue.

4.1 **The types of matters regarded as malpractice for the purposes of this policy are:**

- Fraud or financial malpractice
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Miscarriage of justice
- Endangering the health and safety of an individual
- Endangering the environment
- Concealment of any of the above.
- You believe someone is covering up wrongdoing.

Personal grievances (e.g. bulling, harassment, discrimination) aren't covered by whistle blowing law, unless your particular case is in the public interest. For individual employee grievances please use the Employee Grievance Procedure.

4.2 Anonymous Allegations

You may choose to report your concern anonymously, we would rather be told of real concerns, without your name, than not be told at all. We are serious about this Policy which is there to protect you if you do not give your name. We will decide whether or not to take further a concern expressed anonymously.

In exercising the discretion, we will take into account:

- the seriousness of the issues raised;
- the credibility of the concern; and
- Whether we can find evidence to support the allegation.

4.3 Untrue Allegations

We are sincere in our wish to know about concerns. If you raise a concern in good faith which is not confirmed upon investigation, then no action will be taken against you. If however, you raise a concern frivolously, maliciously or for personal gain, appropriate action will be taken against you

5.0 Procedure

1. If you have a concern about malpractice the issue should first be raised with your line manager either orally or in writing.
2. If you feel unable to raise the matter with your manager, for whatever reason, please raise the matter with Human Resources either orally or in writing.
3. If these channels have been followed and you still have concerns, or if you feel the matter is so serious that you cannot discuss it with any of the above, please contact:

CEO – Phillip Cable

If you have raised your concern internally you will be advised, who is handling the matter, how you can make contact with them and if there is any further assistance required from you. We will give as much feedback as we can without any infringement on a duty of confidence owed by us to someone else.

We will not disclose your identity without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (e.g. if your evidence is required in court), we will discuss with you whether and how we can proceed.

6.1 Independent Support

If you are unsure whether to use the procedure or you want independent general guidance at any stage, you may contact **ACAS on 0300 123 1100** or the independent charity **Protect on 020 3117 2520.**

There may be circumstances where you can report matters to the outside bodies such as regulators or the police.

Signed: Phillip Cable / Director  **Date: 09 Nov 2026 / reviewed**