

WHISTLEBLOWER POLICY

1. PURPOSE

Brunel is committed to conducting all our business in an honest and ethical manner, having full commitment to open communications, and we expect all staff to maintain high standards and act in accordance with our Anti-corruption and Bribery Policy, Code of Conduct and our other internal policies and procedures.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them if they do occur. This policy sets out a framework within which you will be able to raise concerns in relation to the matters set out in Section 3.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all individuals working at all levels of the organization, including senior managers, officers, directors, employees, consultants, contractors, trainees, and third party contractors (collectively referred to as “staff” within this policy).

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected abuse at work. This may include criminal or unlawful activity, miscarriages of justice, danger to health and safety, damage to the environment, failure to comply with any legal obligation or regulatory requirement, bribery, incorrect financial reporting, breach of our internal policies and procedures including the Code of Conduct, fraud or mismanagement, negligence, other activities which amount to serious improper conduct and the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above matters. If you have genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a “whistleblowing concern”) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as your pay and employee benefits. This policy does not replace existing procedures for individual complaints, for example in the field of HR reviews. If you are uncertain whether something is within the scope of this policy you may seek advice from a trusted advisor or contact the Whistleblowing Officer whose contact details are at the end of this policy.

4. RAISING A WHISTLEBLOWING CONCERN

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell the manager in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblower Officer via the SpeakUp line. The SpeakUp line is a misconduct reporting tool enabling our staff to raise a genuine concern related to suspected abuse at work in complete anonymity. It is a free and confidential service that is available by phone and a secure website any time of the day. Contact details are set out at the end of this policy.

5. CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the SpeakUp line and appropriate measures can then be taken to preserve confidentiality.

If the investigation of a report is hampered by your anonymity, you will be requested to disclose your identity. If your identity will be disclosed, this is done only to the people who need this information in the context of the report of the suspected abuse.

6. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, harassment, victimization or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblower Officer via the SpeakUp line immediately.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

7. INVESTIGATION AND OUTCOME

The action taken by us in response to a report of concern under this policy will depend on the nature of the concern. Our appointed Supervisory Board shall receive information on each report of concern and follow-up information on actions taken.

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation, whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

8. IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you may contact the Chairman of the Supervisory Board. Contact details are set out at the end of this policy.

9. EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your Manager or the Whistleblower Officer for guidance.

10. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

The Board of Directors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Whistleblower Officer, in conjunction with the Board of Directors should review this policy from a legal and operational perspective at least once a year.

All staff is responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblower Officer.

CONTACTS:

SpeakUp Line

Web application: <https://www.speakupfeedback.eu/web/3achep>

Telephone service: call one of the numbers listed on the attached country overview

Access code: take note of the access codes listed on the attached country overview, as you will need it to file a report online

Brains: all relevant information of SpeakUp line can be found on Brains -> International -> Corporate -> Culture and Values.

Whistleblower Officer*

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Brunel SpeakUp line country overview

	AUSTRALIA T 1800452051 W www.speakupfeedback.eu/web/3achep/au C 22628 L English		MALAYSIA T 1-800-88-4307 W www.speakupfeedback.eu/web/3achep/my C 94432 L English
	AUSTRIA T 0800-295175 W www.speakupfeedback.eu/web/3achep/at C 24248 L German English		NEW ZEALAND T N/A W www.speakupfeedback.eu/web/3achep/nz C 74898 L English
	BELGIUM T 0800-71365 W www.speakupfeedback.eu/web/3achep/be C 52573 L Dutch English		NIGERIA T N/A W www.speakupfeedback.eu/web/3achep/ne C 24221 L English
	BRAZIL T 08008919678 W www.speakupfeedback.eu/web/3achep/br C 89920 L Brazilian-Portuguese English		NORWAY T 800-18333 W www.speakupfeedback.eu/web/3achep/no C 31995 L English
	CANADA T 1-866-8181239 W www.speakupfeedback.eu/web/3achep/ca C 44578 L English		PAPUA NEW GUINEA T N/A W www.speakupfeedback.eu/web/3achep/pg C 33259 L English
	CHAD T N/A W www.speakupfeedback.eu/web/3achep/td C 15837 L English		PHILIPPINES T 1800 1441 0215 W www.speakupfeedback.eu/web/3achep/ph C 05432 L Filipino English
	CHINA T 108007440179 (Netcom) 108004400179 (Telecom) 4009901434 (China all, shared costs) W www.speakupfeedback.eu/web/3achep/cn C 65614 L Simplified Mandarin English		POLAND T N/A W www.speakupfeedback.eu/web/3achep/pl C 06232 L English
	CZECH REPUBLIC T 800 900 538 W www.speakupfeedback.eu/web/3achep/cz C 13899 L English		QATAR T 8000162 W www.speakupfeedback.eu/web/3achep/qa C 95134 L Arabic English
	DENMARK T 80885638 W www.speakupfeedback.eu/web/3achep/dk C 34826 L English		RUSSIA T 810 800 2626 9902 W www.speakupfeedback.eu/web/3achep/ru C 19050 L Russian English
	FRANCE T 0800-908810 W www.speakupfeedback.eu/web/3achep/fr C 73699 L English		SINGAPORE T 1800-8232206 W www.speakupfeedback.eu/web/3achep/sg C 69512 L English
	GERMANY T 0800-1801733 W www.speakupfeedback.eu/web/3achep/de C 18205 L German English		SOUTH KOREA T 007984424261 W www.speakupfeedback.eu/web/3achep/kr C 41858 L English
	INDIA T 0008004401221 W www.speakupfeedback.eu/web/3achep/in C 57581 L English		SWITZERLAND T 0800-561422 W www.speakupfeedback.eu/web/3achep/ch C 58914 L German English
	INDONESIA T 001 803 440 559 (Indosat) 007 803 440 559 (Telkom) W www.speakupfeedback.eu/web/3achep/id C 19429 L English		THAILAND T 001800 441 4284 W www.speakupfeedback.eu/web/3achep/th C 32728 L Thai English
	IRAQ T N/A W www.speakupfeedback.eu/web/3achep/iq C 98339 L Arabic English		THE NETHERLANDS T 0800 0222931 W www.speakupfeedback.eu/web/3achep/nl C 47895 L Dutch English
	ITALY T N/A W www.speakupfeedback.eu/web/3achep/it C 35196 L English		UNITED ARAB EMIRATES T 80004412727 W www.speakupfeedback.eu/web/3achep/ae C 13930 L Arabic English
	JAPAN T 0120 774878 W www.speakupfeedback.eu/web/3achep/jp C 79080 L English		UNITED KINGDOM T 0800-1693502 W www.speakupfeedback.eu/web/3achep/gb C 98004 L English
	KAZAKHSTAN T 88003332641 W www.speakupfeedback.eu/web/3achep/kz C 20062 L Russian English		UNITED STATES OF AMERICA T 1-866-2506706 W www.speakupfeedback.eu/web/3achep/us C 67719 L English
	KUWAIT T 22282084 W www.speakupfeedback.eu/web/3achep/kw C 29590 L Arabic English		VIETNAM T 120852140 W www.speakupfeedback.eu/web/3achep/vn C 75406 L English

LEGEND
T for telephone number
W for website
C for access code
L for language