PINEAPPLE PARTNERS

Whistleblowing Policy

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1. Purpose

People inside an organisation are usually the first to know when something is seriously wrong, and the ones who find it hardest to say so. This policy exists so that anyone working for or with Pineapple Partners can raise a genuine concern about wrongdoing, safely, confidentially, and knowing it will be acted on.

2. What whistleblowing means

Whistleblowing is raising a concern about a danger, risk or malpractice that affects others: for example, a criminal offence; a failure to meet a legal obligation; a miscarriage of justice; a risk to anyone's health and safety; damage to the environment; or the deliberate covering up of any of these. It is different from a personal grievance about your own employment, which belongs under our grievance procedure. If you are unsure which yours is, raise it anyway and we will point it to the right route.

3. Who can use this policy

Everyone: our employees, temporary workers on assignment, candidates, contractors and suppliers. Workers who blow the whistle are protected by the Public Interest Disclosure Act 1998, and we add our own commitment: no one will suffer any detriment at our hands for raising a genuine concern, even if it turns out to be mistaken. Deliberately false allegations are the one exception and are treated as misconduct.

4. Confidentiality and anonymity

Tell us who you are if you possibly can. We will protect your identity and reveal it only with your consent or where the law requires. Anonymous reports are accepted and considered, but they

are much harder to investigate and impossible to feed back on, so we encourage you to be named and protected instead.

5. How to raise a concern

- First: your line manager or usual contact at Pineapple Partners, verbally or in writing.
- If that is not appropriate, or nothing changes: the Whistleblowing Director, Mathew Vandermotten, on our whistleblowing line 0161 524 1715 or info@cucumber-operations.co.uk.
- If your concern is about the Director himself: raise it externally through one of the routes in section 8, that is exactly what they are for.

You do not need proof, a reasonable and honest suspicion is enough, and you should not attempt to investigate the matter yourself. Give us as full a picture as you can: what happened, when, who was involved, and any documents that support it.

6. What we do next

We acknowledge every concern within five working days and assess how to take it forward, an informal review, an internal enquiry, or a formal investigation. We keep you informed of progress and, wherever the law allows, of the outcome. Where a concern involves a client, we coordinate with them; where it involves a regulator or the police, we hand over and cooperate fully. Records of concerns and outcomes are kept confidentially, and the board reviews whistleblowing activity annually.

7. Support for whistleblowers

Raising a concern takes courage, and we support the people who do it: a named point of contact throughout, protection from victimisation, and, where a concern touches you personally, the option to be accompanied at any meeting. Anyone who victimises or harasses a whistleblower faces our disciplinary procedure.

8. External routes

We would rather hear it first, but you are entitled to go outside, and in some cases should:

- Protect (the whistleblowing charity, formerly Public Concern at Work): free confidential advice on 020 3117 2520, www.protect-advice.org.uk
- The relevant prescribed regulator: for example the Health and Safety Executive, the Information Commissioner’s Office, HMRC, or the Employment Agency Standards Inspectorate, which regulates recruitment businesses (eas@businessandtrade.gov.uk, 020 4566 5333).
- The police, where a crime may have been committed.

9. Responsibilities and review

The Whistleblowing Director owns this policy, ensures concerns are handled to these standards, and reports annually to the board on numbers, themes and outcomes, without identifying individuals. The policy is reviewed every year.

10. Key contacts

- Pineapple Partners whistleblowing line: 0161 524 1715
- Whistleblowing Director: Mathew Vandermotten, info@cucumber-operations.co.uk, Suite 14 to 16a, Astley Park Business Centre, Chaddock Lane, Manchester, M29 7JY
- Protect advice line: 020 3117 2520
- Employment Agency Standards Inspectorate: 020 4566 5333