

# Whistleblowing and Stakeholder Grievance Policy

## 1. Purpose

The company is committed to conducting business ethically, responsibly and transparently.

This policy provides a mechanism for **employees and external stakeholders** to raise concerns about company activities that may be unethical, unsafe, illegal, or harmful to people or the environment.

The company encourages concerns to be raised early so that issues can be addressed promptly and appropriately.

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## 2. Who Can Raise a Concern

This process is available to **all stakeholders**, including:

- Employees and directors
- Contractors and consultants
- Suppliers and supplier employees
- Clients and customers
- Business partners
- Members of the public affected by company activities

Concerns may be raised **confidentially or anonymously** where possible.

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## 3. Types of Concerns Covered

This process covers both **whistleblowing concerns** and **stakeholder grievances**.

Examples include concerns relating to:

- Health and safety risks
- Environmental impacts or harm
- Illegal activities
- Fraud, corruption, or financial misconduct
- Breaches of company policies
- Ethical misconduct
- Harassment or discrimination
- Human rights concerns
- Activities that may negatively affect employees, stakeholders, or communities

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## 4. Issues Not Covered by This Process

The following matters may not be handled through this mechanism:

- Customer service complaints regarding products or services
- General enquiries about the company
- Commercial disputes between businesses
- Personal employment grievances raised by employees (these may be addressed through internal HR procedures)

If a concern falls outside this process, the company will direct the individual to the appropriate contact.

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## 5. How to Raise a Concern

Concerns can be raised by emailing **compliance@jamescargo.com** and should include as much information as possible, such as:

- description of the issue
- location or activity involved
- relevant dates or evidence if available

Reports may be submitted **confidentially or anonymously** where permitted by law.

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## 6. Grievance and Whistleblowing Process

### Step 1 – Acknowledgement

The company will acknowledge receipt of the concern **within 5 working days**.

### Step 2 – Initial Review

The concern will be reviewed to determine:

- whether it falls within the scope of this policy
- whether further information is required

If the issue does not qualify under this process, the individual will be informed and directed to the appropriate channel where possible.

### Step 3 – Investigation

If the concern is accepted, the company will conduct an investigation.

Investigations will normally be completed **within 30 working days**, although complex cases may require additional time.

### Step 4 – Communication

Where appropriate, the company will communicate updates regarding the progress of the investigation.

## Step 5 – Outcome and Resolution

Following the investigation:

- corrective action may be taken if necessary
- policies or procedures may be improved
- the concern will be formally closed

Where possible, the individual who raised the concern will be informed that the matter has been addressed.

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## 7. Protection from Retaliation

The company strictly prohibits retaliation against any individual who raises a concern in good faith.

This protection applies to **all stakeholders**, including employees, suppliers, contractors, clients, and members of the public.

Retaliation may include:

- dismissal
  - harassment
  - discrimination
  - contract termination
  - any unfair treatment resulting from raising a concern
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## 8. Consequences of Retaliation

Any act of retaliation against a whistleblower will be considered a **serious violation of company policy**.

Confirmed retaliation may result in **disciplinary action, including termination of employment or termination of business relationships where appropriate**.

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## 9. Confidentiality and Anonymity

The company will handle all concerns **confidentially where possible**.

Individuals may choose to report concerns anonymously. However, providing contact details may assist the company in investigating the matter effectively.

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## 10. Record Keeping and Continuous Improvement

The company will maintain records of concerns raised under this process.

Information gathered will be used to:

- identify potential risks
- improve company practices
- strengthen ethical, environmental and safety performance.