

# WHISTLEBLOWING POLICY

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**Company Name:** Evolve Document Solutions Limited

**Last Reviewed:** 13<sup>th</sup> October 2025

**Next Review Due:** 12<sup>th</sup> October 2026

**Policy Owner:** Daniel Maddox - Director

## 1. PURPOSE

Evolve Document Solutions Limited is committed to conducting business with honesty and integrity. This policy provides a framework for employees and others associated with the company to raise concerns about wrongdoing or unethical behaviour without fear of victimisation or retaliation.

## 2. SCOPE

This policy applies to:

- All employees (permanent, temporary, and agency staff).
- Contractors, suppliers, and partners.
- Any other individuals working on behalf of the company.

## 3. WHAT CAN BE REPORTED

Examples of concerns that should be raised under this policy include (but are not limited to):

- Criminal activity or suspected criminal activity.
- Fraud, bribery, or corruption.
- Breaches of legal or regulatory obligations.
- Health and safety risks.
- Data protection or information security breaches.
- Attempts to conceal wrongdoing.

## 4. HOW TO RAISE A CONCERN

- Concerns should be raised as soon as possible with a line manager or the Managing Director.
- If the concern relates to management, or if the individual feels unable to raise it internally, they may report it directly to a relevant external authority (e.g., regulator, law enforcement).
- Reports may be made verbally or in writing.

## 5. PROTECTION FOR WHISTLEBLOWERS

- Individuals raising concerns in good faith will not suffer any form of retaliation, victimisation, or disciplinary action, even if the concern proves to be unfounded.
- Malicious or knowingly false allegations may, however, be subject to disciplinary action.

## 6. CONFIDENTIALITY

All disclosures will be treated in confidence, and every effort will be made not to reveal the identity of the whistleblower without their consent, unless required by law.

## 7. RESPONSIBILITIES

- **Directors/Managers** must take all concerns seriously, investigate them promptly, and take appropriate action.
- **All Staff** have a responsibility to speak up if they become aware of wrongdoing.

## 8. REVIEW

This policy will be reviewed annually, or sooner if required by changes in legislation or company practice.

### APPROVAL

Signed:  (Managing Director)

Date: 1/11/2025