



Section
Whistleblowing Policy

Issued to: All LINPAC Group employees

WHISTLEBLOWING POLICY

APRIL 2010

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LINPAC GROUP WHISTLEBLOWING

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1 Whistleblowing Policy

1. Introduction

- 1.1 Integrity is vital to LINPAC and we are committed to the highest standards of quality, honesty, openness and accountability.

As an employee you have an important role in achieving this goal. Employees will usually be the first to know when someone in the organisation is doing something illegal or improper but often feel worried about voicing their concerns. This policy covers the reporting of any genuine concerns you may have about suspected misconduct within the organisation. It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking these would include the following:

- Criminal offences e.g. theft or fraud
- Failure to comply with legal obligations
- Actions which endanger the health or safety of employees or the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above

- 1.2 Whistleblowing is not a channel for employees to raise grievances relating to their personal circumstances. There are existing HR procedures in place to raise general concerns relating to issues such as payroll problems, disciplinary issues and working conditions.

2. How to Report a Concern

- 2.1 You should, in the first instance, raise the matter with your line manager or, if you do not feel this is appropriate, with your senior manager or Human Resource Manager. However, the most appropriate person to contact to report a concern will depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

- 2.2 You may consider that you cannot raise the matter internally. To assist in these circumstances, LINPAC has engaged Expolink who provide an anonymous, free to call and confidential service to enable a report to be made 24 hours a day, 7 days a week.

A report is made by calling the [toll free] helpline from any country in which LINPAC operates (see list of country telephone numbers at the end of this policy). If requested an interpreter can be brought into the call to assist the English-speaking interviewer.

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- 2.3 Reports can also be made via a web based process also provided by Expolink. This is available in several languages. Please access the following web address:

<http://www.expolink.co.uk/linpac>

3. Safeguards

- 3.1 If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution or harassment as a result. Providing you are acting in good faith, it does not matter if you are mistaken. This policy does not, however, extend to anyone who maliciously raises a concern that they know is untrue.
- 3.2 Wherever possible, LINPAC will protect the identity of any employee who raises a concern and who does not want his/her name disclosed. However, this may not always be possible, as any investigation process may in itself reveal the source of information and a statement by the whistleblower may be a necessary part of the evidence.
- 3.3 Concerns expressed anonymously are difficult to investigate; nevertheless they will be followed up at the discretion of LINPAC.

4. Company's Response

- 4.1 The action that will be taken by LINPAC will depend on the nature of the concern. The matters raised may be investigated by management, by Internal Audit or through the disciplinary process. Alternatively they may be subject to independent enquiry.
- 4.2 The employee raising the concern will be given updates on the investigation process and as much information as possible on the outcome of the investigation, subject to the constraints of LINPAC's duty of confidentiality or any other legal constraint. The objective of the various responses would be to ensure that a person expressing a legitimate concern can be assured that the matter has been addressed.

5 Confidential Disclosure

- 5.1 LINPAC's Disciplinary Rules and Code of Conduct require that employees do not disclose confidential, false or misleading information to an unapproved external organisation. This policy makes Expolink a specific exclusion to the terms of the Disciplinary Rules and Code of Conduct.

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Group of Companies

HUMAN RESOURCES – POLICIES AND PROCEDURES MANUAL

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EXPOLINK - International Freephone [toll free] Telephone Numbers

Country	Freephone number	Country	Freephone number
Argentina	0800 6662603	Latvia	8000 26 70
Australia	1800 121 889	Lithuania	8800 30 444
Austria	0800 281700	Luxembourg	8002 4450
Belgium	0800 71025	Malaysia	1800 807055
Brazil	0800 891 8807	Netherlands	0800 022 9026
Bulgaria	00800 110 44 74	New Zealand	0800 443 816
Canada	1888 268 5816	Norway	800 14870
Chile	123 002 004 12	Philippines	1800 1442 0076
China	00800 3838 3000	Poland	00800 441 2392
Croatia	0 800 222 845	Portugal	800 880 374
Cyprus	800 95207	Romania	08008 94440
Czech Republic	800 142 428	Russia (restricted coverage)	810 800 2058 2044
Denmark	8088 4368	Singapore	800 4411 140
Eire	1800 567 014	Slovakia	0800 004461
Estonia	800 00 44 265	Slovenia	0800 80886
Finland	0800 116773	Spain	900 944401
France	0800 900240	Sweden	0200 285415
Germany	0800 182 3246	Switzerland	0800 563823
Greece	00800 441 31422	Thailand	001 800 442 078
Hungary	06800 14863	Turkey	00800 4463 2066
Indonesia	001 803 0441 1201	United Kingdom	0800 374199
Italy	800 783776	USA	1877 533 5310