

Introduction

HPPL is committed to the highest standards of openness, probity and accountability.

Scope of Policy

Enabling interested parties to raise concerns internally, at a high level and to disclose information which the individual believes shows malpractice or impropriety. It covers the concerns which are in the interest of company and public. These concerns include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behavior
- Intentional damage to product, machine, equipment that hampers product quality
- Attempts to conceal any of these

This policy is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is expected from staff to use this policy, rather than air their complaints outside the Company.

Safeguards

i. Protection

Company offers protection to the whistleblower provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety
- to an appropriate person

ii. Confidentiality

Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

iii. Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

iv. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint, the member of staff who receives and takes note of the complaint, must pass it as soon as possible, to the appropriate designated investigating officer as below:

- * Complaints of malpractice will be investigated by the appropriate HOD unless the complaint is against the HOD or is in any way related to the actions of the HOD. In such cases, the complaint should be passed to the Managing Director for referral.
- * In case the complaint is any way connected with but not against the HOD, the Managing Director will nominate a Senior Manager to act as the alternative investigating officer.
- * Complaints against the Managing Director should be passed to the MD, who will nominate an appropriate investigating officer.
- * The complainant has the right to bypass the line management structure and take their complaint direct to the MD. The MD has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

If none of the above routes is suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated and trained as independent point of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

1. Managing Director
2. Process Owner - HR

If there is evidence of criminal activity then the investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

Investigating Procedure

The investigating officer should follow these steps:

- * Full details and clarifications of the complaint should be obtained.
- * The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- * The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the MD / Managing Director.
- * The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- * A judgment concerning the complaint and validity of the complaint will be made by the investigating officer. This judgment will be detailed in a written report containing the findings of the investigations and reasons for the judgment. The report will be passed to the Managing Director or MD as appropriate.
- * The Managing Director / MD will decide the action. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.
- * The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- * If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.

If not satisfied with the dealing by the investigating officer, the complainant has the right to raise it in confidence with the Chief Executive / MD, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Company recognizes the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as Health and Safety Officer, Labor Commissioner), or, where justified, elsewhere.

Date: 01.01.2018

Managing Director