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# GGW WHISTLE BLOWING POLICY

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# Summary

## 1. Purpose

This policy aims to establish procedures for the disclosure of information regarding potential misconduct within the Company, in alignment with public interest principles. It applies to all employees, including temporary and casual staff.

## 2. Protection of Whistle-blowers

The Company is committed to protecting individuals who make good faith disclosures under this policy from any form of retaliation or detriment. Victimisation or harassment of a whistle-blower constitutes a disciplinary offence.

## 3. Scope of Protected Disclosures

This policy applies to disclosures made in the public interest, where the individual reasonably believes that one or more of the following has occurred, is occurring, or is likely to occur:

- a) Commission of a criminal offence
- b) Breach of legal obligations.
- c) Miscarriage of justice.
- d) Endangerment of an individual's health and safety.
- e) Environmental damage.

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Deliberate concealment of information pertaining to any of the above.

## 4. Disclosure Procedure

### 4.1 Internal Reporting

Concerns should be initially raised with [DESIGNATED AUTHORITY]. If inappropriate, concerns may be escalated to senior management.

### 4.2 Investigation Process

An investigation will be conducted promptly. The whistle-blower may be required to attend an investigatory meeting and may be accompanied by a colleague.

### 4.3 Confidentiality and Outcomes

The Company will maintain confidentiality to the extent possible and will inform the whistle-blower of the investigation's outcome, subject to legal constraints.

## 5. External Reporting

If dissatisfied with the internal process, the whistle-blower may report to:

a) Relevant Prescribed Persons as designated by current legislation.

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Appropriate external authorities with legal responsibility.

c) Protect, an independent whistleblowing charity.

## **6. Legal Protection**

Disclosures made to legal advisors in the course of obtaining legal advice are protected.

## **7. False or Malicious Disclosures**

Disclosures made in bad faith, without substantial belief in their veracity, or for personal gain may result in disciplinary action.

## **8. Policy Review**

This policy will be regularly reviewed and updated to ensure compliance with evolving legislation and best practices in corporate governance.

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# **PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING) POLICY**

## **1. PURPOSE**

The purpose of this Whistleblowing Policy is multifaceted, reflecting GGWCare's commitment to fostering a workplace that prioritises ethical behaviour, transparency, and accountability. By establishing robust procedures to encourage the reporting of unethical practices and misconduct, the Company aims to create an environment where employees feel supported in voicing their concerns about activities that could potentially harm the organisation or the broader community.

## **CREATING A SAFE ENVIRONMENT**

A fundamental goal of this policy is to create a safe space for employees at all levels to come forward with concerns without fear of retaliation or negative consequences. An environment that encourages open dialogue enables individuals to feel secure in reporting wrongdoings, whether they be large-scale fraudulent activities or minor ethical infractions. It is essential that every employee—regardless of their job title or employment status—understands that their voice matters and that their concerns will be taken seriously.

## **ENCOURAGING ETHICAL PRACTICES**

In line with the overarching goal of promoting ethical conduct, this policy stresses the importance of identifying and addressing questionable practices promptly. Education and awareness are integral components of this initiative. Employees are encouraged to familiarise themselves with the types of misconduct that fall under the purview of this policy, including but not limited to financial impropriety, violations of legal obligations, safety hazards, and any behaviour that compromises the integrity of GGWCare.



By promoting awareness, the policy not only equips employees with the knowledge of what constitutes wrongdoing but also empowers them to act as stewards of ethical behaviour within the Company. Encouraging employees to speak up cultivates a culture of vigilance and responsibility, which is essential for safeguarding the integrity of the organisation.

### **ESTABLISHING CLEAR PROCEDURES**

A critical aspect of the Whistleblowing Policy is to provide clear and straightforward procedures for reporting potential misconduct. Transparency in the reporting process ensures that all employees, whether permanent, temporary, or casual staff, understand the steps necessary to disclose their concerns effectively. The policy delineates specific channels through which concerns can be reported, along with the protocols involved in each step of the process.

This clarity reduces ambiguity and fosters a proactive approach among employees, reinforcing the idea that raising concerns is not only acceptable but encouraged. It also ensures that reports are addressed in a structured manner, allowing for timely investigations and appropriate responses to the issues raised.

### **UPHOLDING INTEGRITY AND ACCOUNTABILITY**

At the heart of this policy lies the principle of accountability. GGWCare seeks to uphold the highest ethical standards by holding all employees accountable for their actions, both to themselves and to their colleagues. Through the implementation of this policy, the Company emphasises that each employee plays a crucial role in maintaining ethical standards and that they have a responsibility to report any behaviour that deviates from these principles.

Furthermore, accountability extends to leadership and management, who are tasked with creating an atmosphere of trust and support for employees who choose to speak out. Leadership must actively demonstrate their commitment to these values, reinforcing that ethical behaviour is a shared responsibility that permeates the entire organisation.

### **PROTECTING ORGANISATIONAL AND PUBLIC INTERESTS**



Ultimately, the Whistleblowing Policy serves not only to protect the interests of the Company but also to prioritise the welfare of the public and the community at large. By enabling employees to report unethical or harmful practices, GGWCare contributes to a larger commitment to corporate social responsibility. Addressing misconduct is not merely about protecting the organisation from reputational damage but also about ensuring that the Company operates in a manner that is ethical, lawful, and beneficial to society.

**I**n conclusion, this Whistleblowing Policy embodies GGWCare's dedication to creating an ethical, transparent, and accountable workplace. It encourages the active participation of all employees in upholding the organisation's integrity while providing the necessary protections and support for those who bravely voice their

concerns. By doing so, GGWCare not only safeguards its own interests but also reinforces its commitment to the broader community, ultimately fostering trust and respect in all of its operations.

## 2. PROTECTION OF WHISTLE-BLOWERS

GGWCare is unwavering in its commitment to safeguarding the rights and well-being of individuals who come forward to report concerns under this Whistleblowing Policy. The protection of whistle-blowers is a cornerstone of this initiative, reflecting the Company's belief that transparency and accountability can only thrive in an environment where individuals feel secure in voicing their concerns without fear of retribution.

### COMMITMENT TO GOOD FAITH DISCLOSURES

At the heart of this protection is the principle of good faith. GGWCare defines a good faith disclosure as a report made by an employee who genuinely believes that they have witnessed wrongdoing, misconduct, or unethical behaviour within the organisation. Employees should feel confident that their intentions are understood—that they are acting out of a desire to improve the workplace and to uphold ethical standards. This policy emphasises that reporting concerns in good faith is not only encouraged but is a vital part of maintaining the integrity of the organisation.

### COMPREHENSIVE PROTECTION AGAINST RETALIATION

To ensure that whistle-blowers can report their concerns without hesitation, GGWCare prohibits any form of retaliation or discrimination against individuals who make disclosures. This means that employees who come forward will not face any adverse effects in their employment status, treatment, or work environment as a consequence of their actions.

## Retaliation may manifest in various detrimental ways, including:

- **Victimisation:** Targeting the whistle-blower for harassment or exclusion from workplace activities as a form of punishment.
- **Harassment:** Subjecting the whistle-blower to unwelcome actions, comments, or conduct that creates a hostile work atmosphere.



**- Negative Workplace Consequences:** Such issues may involve unjustified changes to work assignments, denial of promotions or raises, or even termination of employment based on the existing desire to silence or discredit the whistle-blower.

By explicitly banning these actions and considering them serious disciplinary offenses, GGWCare not only protects whistle-blowers but also reinforces an organisational culture that values integrity and ethical behaviour.

## REPORTING MECHANISM FOR RETALIATION

In addition to protecting whistle-blowers, GGWCare encourages employees to report any forms of retaliation they may experience or witness. The Company has instituted multiple reporting mechanisms for these situations to ensure that concerns about retaliation are addressed promptly and effectively. Employees can report these instances directly to designated authorities within the organisation or use anonymous channels where appropriate. This vigilance helps maintain an environment where accountability flourishes and where individuals are motivated to report issues without fear.

## ACCOUNTABILITY FOR VIOLATIONS

Actions taken against whistle-blowers will not only face immediate scrutiny but will also trigger a thorough investigation to uphold the integrity of the policy. GGWCare takes allegations of retaliation very seriously. Any employee found to have violated this policy by retaliating against a whistle-blower will be subject to disciplinary action, which may include termination of employment, sanctions, or other corrective measures as deemed appropriate by management. This commitment reinforces that unethical treatment of whistle-blowers is intolerable and serves as a strong deterrent for potential violators.

## FOSTERING A SUPPORTIVE ENVIRONMENT

GGWCare recognises that the psychological and emotional well-being of whistle-blowers is critical for creating a supportive environment. The Company will strive to provide resources and support mechanisms to help individuals navigate their experiences after making a disclosure. This includes access to counselling services, workshops on conflict resolution, and training on handling workplace relations in the wake of a report. By promoting mental and emotional resilience, GGWCare enhances

the overall corporate culture and reinforces the belief that individuals can make a positive difference within the organisation.

## **CULTIVATING A CULTURE OF TRUST**

Ultimately, the protection of whistle-blowers aligns with GGWCare's broader objective of cultivating a culture rooted in trust, mutual respect, and ethical conduct. When employees know that their disclosures will be met with support and protection, it fosters a collaborative atmosphere where concerns can be addressed openly, and improvements can be made. Whistle-blowers become catalysts for positive change, leading by example and encouraging their colleagues to uphold ethical standards.

In conclusion, GGWCare's unwavering commitment to protecting whistle-blowers is fundamental to its ethical framework. Through the enforcement of this policy, the Company not only safeguards those who speak out but also promotes a proactive approach to accountability and transparency. By standing firm against retaliation and creating a genuinely supportive environment, GGWCare ensures that every employee feels empowered to voice their concerns, thereby contributing to the overall integrity and success of the organisation.

### 3. SCOPE OF PROTECTED DISCLOSURES

The Scope of Protected Disclosures section of this Whistleblowing Policy is crucial for defining the boundaries of what constitutes a reportable concern, thereby helping employees understand the specific issues they are empowered to disclose. By clearly identifying the types of misconduct that fall within this scope, GGWCare ensures that all employees can recognise and act upon serious matters that may affect the integrity and function of the organisation, as well as the safety and well-being of individuals and the public.

#### KEY CATEGORIES OF PROTECTED DISCLOSURES

Disclosures are protected under this policy when individuals reasonably believe that one or more of the following conditions exist:

##### **a) Commission of a Criminal Offence:**

This encompasses any actions that violate criminal law and can include serious offences such as fraud, bribery, corruption, embezzlement, or theft. Employees are empowered to report suspicious activities that threaten the security and integrity of the Company or involve illegal actions that could potentially harm stakeholders or the wider community. It is vital for employees to understand that not only are they entitled to report these offences, but their obligation to do so is critical for upholding the law and promoting ethical business practices.

##### **b) Breach of Legal Obligations:**

This category covers instances where GGWCare fails to meet its obligations under applicable laws and regulations or breaches contractual commitments. This may include, but is not limited to, violations of labor laws, health and safety regulations, data protection mandates, or environmental standards. Employees should be vigilant in identifying any actions that could be viewed as non-compliance, as these breaches not only expose the Company to legal ramifications but can also endanger the welfare and rights of employees, clients, and the general public.

### **c) Miscarriage of Justice:**

Disclosures relating to miscarriages of justice include situations where an individual may be wrongfully accused or unjustly treated within the Company. This can cover a range of scenarios, such as wrongful termination based on false accusations or discriminatory practices that lead to unfair treatment. Recognising such injustices is essential in fostering an equitable work environment, therefore employees are encouraged to report any behaviours that violate principles of fairness, dignity, and respect.

### **d) Endangerment of an Individual's Health and Safety:**

This essential category focuses on concerns related to actions or conditions that might jeopardise the health and safety of employees or others in the workplace. This could include unsafe working environments, failure to follow safety protocols, lack of necessary safety equipment, or any behaviour that negatively impacts physical wellbeing. Employees are urged to act upon their instincts and report any hazards they perceive, thereby prioritising the well-being of their coworkers and themselves.

### **e) Environmental Damage:**

In today's context of heightened environmental awareness, this category addresses actions that can lead to environmental harm, including pollution or degradation of natural resources. This may involve improper waste disposal, failure to adhere to environmental laws, or actions that harm public areas and ecosystems. Employees have a responsibility not only to report such practices but also to recognise the long-term implications these actions have on the planet and future generations.

### **f) Deliberate Concealment of Information:**

This includes the intentional hiding or manipulation of information that relates to the aforementioned categories, which can significantly impact transparency, accountability, and trust within the organisation. Such concealment may involve covering up unethical behaviour, suppressing evidence of wrongdoing, or failing to communicate critical information pertinent to public safety or welfare. Employees

must be vigilant in recognising and reporting any attempts to obscure the truth, as these actions undermine the foundation of integrity that GGWCare seeks to uphold.

## **EMPHASISING REASONABLE BELIEF**

It is vital to note that disclosures made under this policy are protected when employees reasonably believe that any of the outlined conditions have occurred, are occurring, or are likely to occur. This means employees do not need to provide incontrovertible evidence of wrongdoing; rather, a sincere belief based on observable facts or credible information is sufficient. This reasonable belief standard empowers individuals to act on their instincts and encourages them to take action for the greater good, ensuring that potential issues are brought to light before they escalate into more serious problems.

## **CONCLUSION**

The Scope of Protected Disclosures is designed to create a clear understanding of what constitutes reportable behaviour while simultaneously empowering employees to act responsibly and ethically. By recognising and reporting serious matters such as criminal offences, breaches of legal obligations, and endangerment to health or the environment, employees play an essential role in upholding GGWCare's commitment to integrity, accountability, and ethical practices. This proactive approach not only helps to protect the organisation and its stakeholders but also cultivates a culture of honesty and transparency, where every employee feels a sense of ownership and responsibility toward the organisation's ethical standards.

## 4. DISCLOSURE PROCEDURE

The Disclosure Procedure is a crucial component of GGWCare's Whistleblowing Policy, detailing the systematic process through which employees can report concerns, the methods of investigation that follow, and the protections surrounding confidentiality. A well-defined procedure not only promotes transparency and accountability but also empowers employees to voice their concerns with confidence, knowing there are established pathways for action.

### 4.1 INTERNAL REPORTING

The initial step in the disclosure procedure emphasises internal reporting, encouraging employees to bring their concerns directly to the designated authority within GGWCare. This designated authority serves as the first point of contact and is specifically trained to handle disclosures with sensitivity, professionalism, and expertise. By encouraging employees to report internally first, the Company aims to resolve issues quickly and effectively before they escalate into larger problems.

The designated authority is equipped with a clear understanding of the Whistleblowing Policy and associated procedures, enabling them to assess the validity of disclosures and initiate appropriate action. Employees should feel encouraged to share their concerns in a supportive environment where they are met with understanding, ensuring they do not feel isolated or unsupported.

Should an employee feel that their concerns have not been adequately addressed or resolved satisfactorily at this level, they have the freedom to escalate the matter to senior management for further review. This tiered approach is pivotal, as it ensures that concerns are handled efficiently by the right individuals, facilitating a prompt response to potential misconduct. This method also provides a safety net for employees, ensuring that they have multiple avenues for recourse if their initial report does not yield the expected attention or resolution.



## 4.2 INVESTIGATION PROCESS

Once a disclosure is made, GGWCare commits to a thorough and prompt investigation. This commitment signifies the Company's dedication to addressing concerns genuinely and transparently. The investigation process is structured to ensure the integrity of both the investigation itself and the whistle-blower's experience.

The Company may request the whistle-blower to participate in an investigatory meeting, where they can present their information and details surrounding their concerns. This inclusive approach ensures that the whistle-blower has a voice during the proceedings and can provide any context or evidence that may be necessary for a comprehensive examination of the issues raised. Understanding the emotionally charged nature of such situations, the policy allows the whistle-blower to be accompanied by a colleague or representative for support during these meetings. This provision emphasises the importance of emotional safety and empowerment for those who come forward.

The primary objective of the investigation process is to gather as much factual information as possible to assess the credibility of the claims made. Investigators will follow a transparent procedure, examining all relevant facts, interviewing witnesses, and scrutinising documents or other evidence. This diligent approach not only increases the likelihood of finding the truth but also reinforces the integrity of GGWCare as an organisation that takes each claim seriously.

## 4.3 CONFIDENTIALITY AND OUTCOMES

Confidentiality is paramount in the whistleblowing process. GGWCare ensures that investigations are conducted with the utmost discretion. The identities of individuals making disclosures will be protected to the maximum extent feasible, with information shared strictly on a need-to-know basis or as mandated by law. This commitment to confidentiality serves multiple purposes: it protects the whistle-blower from potential retaliation, preserves the integrity of the investigation, and fosters an atmosphere of trust within the organisation.

Throughout the investigation, the whistle-blower will receive updates on the process, although the extent of the information shared may be governed by legal constraints. Once the investigation concludes, the Company commits to informing the whistle-blower of the outcome in general terms. While specific details may be limited to

protect the confidentiality of all parties involved, the whistle-blower should receive confirmation that their concerns have been taken seriously and that appropriate action has been taken as a result of the investigation.

The outcomes of investigations may lead to several actions, including disciplinary measures against wrongdoers, changes in policies or practices to prevent future misconduct, and, where applicable, remedial actions to address any harm caused by the reported misconduct. This feedback loop is critical, as it allows whistle-blowers to understand the impact of their disclosures, reinforcing their value to the organisation and encouraging future reporting.

## CONCLUSION

In summary, the Disclosure Procedure outlined in GGWCare's Whistleblowing Policy is designed to facilitate a transparent and supportive process that empowers employees to speak up about misconduct or unethical behaviour. Through internal reporting, a thorough investigative process, and stringent confidentiality protocols, the Company creates an environment where employees can confidently express their concerns. This not only addresses immediate issues but also contributes to a healthier organisational culture characterised by integrity, accountability, and moral courage. By prioritising these principles, GGWCare underscores its commitment to ethical practices and the well-being of all employees, ultimately fostering a safe and thriving workplace.

## 5. EXTERNAL REPORTING

The External Reporting section of GGWCare's Whistleblowing Policy acknowledges that while the Company aims to address all concerns through its internal processes, there may be circumstances where employees feel dissatisfied with the handling or outcome of their disclosures. In such cases, the policy provides a clear pathway for employees to report their concerns to external authorities, thus ensuring that their voices are heard and that issues are addressed appropriately.

### ACCESS TO EXTERNAL REPORTING

It is crucial for employees to understand their rights and options regarding external reporting. This step is designed not only to empower whistle-blowers to act when they feel their concerns are unresolved but also to uphold the ethical standards of the organisation. The process of external reporting is an essential safety net that reinforces an employee's courage to speak up while ensuring that serious matters are not overlooked.

#### a) Relevant Prescribed Persons

Employees have the right to report concerns to Relevant Prescribed Persons, which are entities designated by current legislation to receive whistleblowing disclosures. These prescribed persons often include specific regulatory bodies or oversight agencies tasked with monitoring compliance in various sectors. For example:

**- Financial Conduct Authority (FCA):** In finance and insurance, employees can report instances of fraud or mismanagement directly to the FCA, which has the authority to enforce regulations and implement corrective measures.

**- Health and Safety Executive (HSE):** Employees who observe serious health and safety violations can report these to the HSE, which can conduct investigations and enforce compliance with health and safety laws.

These bodies provide an independent platform for employees to escalate unresolved issues, allowing the concerns raised to be addressed by external entities that have the power to act. This reporting not only serves to protect the individual whistle-blower but also helps to safeguard the welfare of other employees and the public, as these organisations are vested with the authority to enforce corrective actions.

## b) Appropriate External Authorities

In addition to relevant prescribed persons, employees may also report their concerns to other appropriate external authorities that possess specific legal responsibilities to address particular issues. This may include:

**- Environmental Protection Agencies:** For disclosures related to environmental misconduct, such as pollution or non-compliance with environmental regulations, employees can contact agencies responsible for enforcing environmental laws.

**- Public Health Authorities:** In situations where there is an endangerment to public health, such as failure to adhere to sanitation standards or unsafe medical practices, employees can turn to public health authorities that can investigate and intervene as necessary.

By empowering employees to report to these external authorities, GGWCare reinforces its commitment to accountability and ethical conduct, ensuring that serious issues do not go unreported or unresolved. This approach also demonstrates a proactive stance on compliance, as it acknowledges that sometimes internal mechanisms may need additional support from regulatory bodies equipped with investigative and enforcement powers.

## c) Protect, an Independent Charity

For employees who may feel uncertain about the external reporting process or require additional support, GGWCare recognises the importance of Protect, an independent charity dedicated to supporting whistle-blowers. Protect offers a range of services designed to assist individuals in navigating their options for external reporting and understanding their rights. This includes:

**- Confidential Advice:** Whistle-blowers can seek confidential guidance on how to report their concerns effectively, ensuring they understand the implications of their actions and the processes they will encounter.

**- Supportive Resources:** Protect provides resources and tools for employees to make informed choices, offering templates for reporting, explanations of legal protections, and insights into the procedures they can expect from external authorities.

**- Advocacy and Representation:** For individuals who face challenges during the reporting process, Protect can advocate on their behalf, helping them navigate potential obstacles and ensuring their voices are heard.

This partnership with Protect reflects GGWCare's acknowledgment that whistle-blowers may require external support to bolster their confidence and facilitate their disclosures. By connecting employees with resources available from an independent organisation, GGWCare underscores its commitment to the welfare of whistle-blowers, helping them navigate potentially complex external reporting scenarios.

## CONCLUSION

The External Reporting section of GGWCare's Whistleblowing Policy serves as a critical component in the overall framework designed to protect and empower employees. By providing clear options for escalation, including reporting to relevant prescribed persons, appropriate external authorities, and organisations like Protect, the Company assures its employees that their concerns will not only be taken seriously but also addressed effectively, regardless of the internal outcomes. This proactive approach not only fosters a culture of integrity and accountability but also reinforces GGWCare's dedication to upholding ethical standards, protecting employees, and ensuring the welfare of the wider community. Empowering employees through external reporting options plays a vital role in creating a transparent and responsive organisational culture where misconduct is addressed swiftly and thoroughly.

## 6. LEGAL PROTECTION

The Legal Protection section of GGWCare's Whistleblowing Policy underscores the Company's commitment to safeguarding employees who make disclosures concerning potentially illegal or unethical behaviours, particularly when these disclosures are made in pursuit of legal counsel. This legal protection is a crucial element, ensuring that employees can seek necessary guidance and advice without fear of negative consequences, thereby fostering an environment of transparency and compliance with the law.

### THE IMPORTANCE OF LEGAL PROTECTION

**1. Encouraging Openness:** Legal protection for disclosures to legal advisors encourages employees to be open and candid regarding their concerns. When employees know that they can discuss sensitive information with legal professionals without facing retaliation, they are more likely to come forward with relevant issues, thus allowing the Company to address potential misconduct effectively.

**2. Ensuring Compliance:** Legal protections help ensure that GGWCare remains compliant with employment laws and regulations surrounding whistleblowing. By facilitating access to legal counsel, the Company enables employees to understand the legal implications of their actions and the protections available to them, reinforcing a culture of adherence to both internal policies and external laws.

**3. Facilitating Responsible Disclosure:** When employees can engage with legal advisors, they are equipped to make informed decisions regarding their disclosures. Legal advisors can help individuals assess the validity of their concerns, guide them on potential reporting routes, and clarify the ramifications of making disclosures, thus promoting responsible and thoughtful reporting.

### SCOPE OF LEGAL PROTECTION

The legal protection afforded to disclosures made for the purpose of obtaining legal advice encompasses several key aspects:



**1. Protection of Confidentiality:** Disclosures made to legal advisors are typically protected under attorney-client privilege, which means that the communications between the employee and their legal counsel cannot be disclosed without the mutual consent of both parties. This confidentiality allows employees to discuss their concerns openly, knowing that sensitive information will not be shared externally.

**2. Protection from Retaliation:** Employees who seek legal advice based on a belief that serious misconduct has occurred are protected from retaliation as a result of that consultation. This means that if an employee approaches a legal advisor to discuss their concerns, GGWCare commits to ensuring that they will not face adverse actions—such as unfair treatment, demotion, or termination—because they sought legal counsel.

**3. Support in Legal Proceedings:** Should the disclosure lead to any legal proceedings or actions, employees may rely on the protections established by the law regarding whistleblower retaliation. This legal framework empowers whistle-blowers to pursue their concerns further and seek justice if they encounter retaliation as a result of their disclosure.

## PROMOTING ETHICAL PRACTICES

By reinforcing the importance of seeking legal counsel, GGWCare acknowledges that ethical decision-making can sometimes involve navigating complex legal landscapes. Employees must feel equipped to understand both their rights and the implications of their actions. This commitment to legal protection also highlights the value of ethics within the Company:

**1. Empowerment through Knowledge:** Employees who receive legal advice can better understand their rights, responsibilities, and the frameworks they operate within, enhancing their confidence in making disclosures. Knowledge itself is a form of power—when employees are informed, they are more likely to act in accordance with ethical principles and the best interests of the Company.

**2. Establishing a Trust-based Culture:** By providing clear avenues for legal counsel and protecting these conversations, GGWCare fosters an environment of trust. Employees are more likely to view the organisation as a supportive and ethical workplace, which can enhance employee morale and overall engagement.

**3. Mitigating Risk:** Effective communication with legal advisors can help mitigate risks for the Company by ensuring that employees understand how to navigate potential issues before they escalate into more significant problems. Legal guidance can provide clarity on potential legal exposures, thus allowing the Company to proactively address issues and uphold ethical standards.

## CONCLUSION

The Legal Protection section of GGWCare's Whistleblowing Policy is integral in ensuring that employees feel empowered to seek legal advice without fear of repercussions. By emphasising the confidentiality and protections surrounding disclosures made to legal advisors, the policy promotes transparency and legal compliance within the organisation. This legal protection strengthens the overall framework of the Whistleblowing Policy, encouraging individuals to bring forward their concerns and engage in responsible reporting. GGWCare's dedication to upholding ethical practices lays the groundwork for promoting a culture of integrity while ensuring that employees are fully supported in voicing their concerns and making informed decisions about their legal rights and responsibilities.

## 7. FALSE OR MALICIOUS DISCLOSURES

The section on False or Malicious Disclosures in GGWCare's Whistleblowing Policy is an essential component that addresses the potential misuse of the reporting system. While the policy is designed to encourage transparency and ethical behaviour, it is equally important to deter actions that could undermine the integrity of the whistleblowing process. This policy not only protects genuine whistle-blowers but also delineates the consequences of reporting false information or disingenuously motivated claims.

### UNDERSTANDING FALSE OR MALICIOUS DISCLOSURES

#### 1. Definition and Context:

False or malicious disclosures refer to reports made with malicious intent or without a reasonable belief in their validity. This can include claims that are fabricated, exaggerated, or misrepresented with the intention to harm another individual's reputation, disrupt workplace harmony, or achieve personal gain—such as retribution against a colleague or securing an advantage for oneself.

#### 2. Impacts on the Organisation:

Such disclosures can have profound repercussions for both the organisation and the individuals involved. False allegations can damage the reputations of innocent employees, disrupt team dynamics, and lead to unwarranted investigations that consume valuable time and resources. Additionally, they create an atmosphere of distrust, where employees may become hesitant to report genuine concerns due to fear of being unjustly labeled or falsely accused themselves.

### UPHOLDING THE INTEGRITY OF THE WHISTLEBLOWING PROCESS

#### 1. Ensuring Accountability:

To uphold the integrity of the whistleblowing process, GGWCare emphasises that individuals making disclosures must do so in good faith with a genuine belief that their concerns are valid. Employees should be aware that assertions not backed by reasonable evidence or that are motivated by ulterior motives will be treated seriously.

## **2. Disciplinary Actions:**

The policy explicitly states that making false claims will result in disciplinary actions against the individual responsible. Such actions may include warnings, formal reprimands, suspension, or even termination, depending on the severity of the offence. By establishing clear consequences, GGWCare reinforces the seriousness of the matter, highlighting that the integrity of the reporting system must be maintained for it to function effectively.

## **3. Educational Efforts:**

GGWCare is committed to educating its employees about the importance of integrity in the disclosure process. Training sessions can be conducted to raise awareness about what constitutes a legitimate disclosure and the ethical implications of making false claims. Employees should be encouraged to engage in discussions about ethics and reflect on the ramifications of their actions, thereby fostering a culture of honesty and accountability.

### **SUPPORTING GENUINE WHISTLE-BLOWERS**

## **1. Distinguishing Between Good Faith and Malicious Claims:**

It is essential for the Company to foster an environment where genuine whistle-blowers feel safe and validated. By clearly differentiating between false/malicious disclosures and those made in good faith, GGWCare seeks to sustain an open culture. This includes providing support systems for legitimate concerns and ensuring that whistle-blowers are not discouraged by the potential for disciplinary measures aimed at fraudulent claims.

## **2. Encouraging Responsible Reporting:**

Employees should feel encouraged to report their concerns responsibly. They ought to understand that they can seek guidance or clarification on the reporting process if they are in doubt about the legitimacy of their claims. The Company should provide resources to help employees arrive at informed decisions before formalising any disclosures.

### **3. Maintaining Confidentiality and Support:**

GGWCare will continue to uphold confidentiality for all whistle-blowers to protect them from any form of reprisal in cases where a genuine concern turns out to be unfounded. This assurance can help alleviate fears and encourage employees to speak up without the anxiety of being implicated in false reporting.

### **CONCLUSION**

The False or Malicious Disclosures section of GGWCare's Whistleblowing Policy serves as a necessary safeguard to ensure the integrity and effectiveness of the whistleblowing process. By emphasising that disclosures must be made in good faith and defining consequences for those who act maliciously, GGWCare addresses the need for accountability and ethical reporting. This balanced approach is vital for maintaining a culture of trust, transparency, and ethical behaviour within the organisation. Ultimately, by clearly outlining the standards for reporting and the repercussions for false claims, GGWCare reaffirms its commitment to protecting genuine whistle-blowers while deterring unethical behaviour that could compromise the integrity of the organisation.

## 8. POLICY REVIEW

The Policy Review section of GGWCare's Whistleblowing Policy is a critical aspect designed to ensure the policy remains relevant, effective, and aligned with current legal standards and best practices in corporate governance. A systematic review process reflects the Company's ongoing commitment to creating a transparent and accountable workplace culture where employees can confidently report misconduct and unethical behaviours without fear of retaliation.

### IMPORTANCE OF REGULAR REVIEWS

#### 1. Adaptation to Evolving Legislation:

Laws and regulations governing whistleblowing and corporate conduct are continuously evolving. GGWCare recognises the need to adapt its policies to remain compliant with local, national, and international laws. By scheduling regular reviews, the Company can swiftly integrate any changes in legislation into its policies, ensuring that both the organisation and its employees are aware of and adhere to the latest legal requirements.

#### 2. Incorporation of Best Practices:

Best practices in corporate governance are not static; they develop as organisations learn from experiences, gain insights, and respond to new challenges. By reviewing the Whistleblowing Policy regularly, GGWCare can incorporate best practices from leading organisations and industry standards, thereby enhancing the effectiveness of its whistleblowing framework. This proactive approach demonstrates a commitment to ethical governance.

#### 3. Assessment of Policy Effectiveness:

Regular reviews facilitate the assessment of how effectively the Whistleblowing Policy is functioning within the organisation. This includes analysing the number of reports made, the outcomes of investigations, employee feedback, and any trends related to reporting actions. By understanding how well the policy is working, GGWCare can make informed decisions on necessary revisions, identify areas for improvement, and determine if additional training or resources are needed.



## REVIEW PROCESS

### 1. Timeline for Reviews:

GGWCare will establish a clear timeline for periodic reviews of the Whistleblowing Policy. This may include annual reviews or biennial assessments, depending on the changing landscape of laws and organisational needs. Such predictability ensures that reviews are conducted systematically and consistently.

### 2. Involvement of Stakeholders:

The review process may involve key stakeholders, including representatives from various departments such as Human Resources, Legal, Compliance, and Employee Relations. Engaging diverse perspectives ensures that the policy reflects the views and concerns of multiple areas within the organisation, contributing to a more holistic evaluation.

### 3. Employee Input:

Seeking input from employees who utilise the Whistleblowing Policy is vital to its success. GGWCare may implement feedback mechanisms such as surveys, focus groups, or open forums to gather insights from employees regarding their experiences with the policy. Understanding employees' perspectives can highlight any barriers to reporting and reveal opportunities for refinement.

### 4. Documentation and Reporting:

Following each review, GGWCare will document the findings and any modifications made to the policy. This documentation serves not only as a record but also as a communication tool to inform all employees about changes and the rationale behind them. Maintaining transparency in updates fosters trust and encourages ongoing engagement with the policy.

## IMPROVING TRANSPARENCY AND TRUST

### 1. Clarifying Changes to Employees:

Whenever updates are made to the Whistleblowing Policy, the Company will communicate these changes to all employees through appropriate channels such as

emails, newsletters, and training sessions. This ensures that everyone is aware of the current policy framework and understands their rights and responsibilities under it.

## **2. Training and Awareness Campaigns:**

To reinforce the updated policy, GGWCare may conduct training sessions or awareness campaigns designed to educate employees on the significance of the Whistleblowing Policy, the procedures for reporting concerns, and the protections afforded to whistle-blowers. Engaging employees through educational initiatives not only increases familiarity with the policy but also empowers them to act confidently when they feel compelled to report wrongdoing.

## **3. Fostering a Continuous Improvement Culture:**

By committing to regular reviews and updates, GGWCare cultivates a culture of continuous improvement within the organisation. Employees can see the dedication to fostering an ethical workplace, reinforcing their trust in the Company's commitment to integrity and accountability.

## **CONCLUSION**

The Policy Review section of GGWCare's Whistleblowing Policy highlights the Company's proactive approach to ensuring that the policy remains relevant, effective, and aligned with legislative changes and best practices in corporate governance. Through systematic evaluation and engagement with stakeholders, GGWCare demonstrates its commitment to maintaining a transparent and responsive culture. By actively involving employees in the process and communicating changes effectively, the Company fosters an environment where all individuals feel secure in reporting concerns, ultimately enhancing ethical behaviour and accountability within the organisation. The ongoing commitment to policy review underscores GGWCare's dedication to creating a workplace built on trust, integrity, and the collective responsibility to uphold ethical standards.