

# WHISTLEBLOWING POLICY

May 2026 – version 3

## 1. Purpose

APL Health Limited (“the Company”) is committed to conducting business with honesty, integrity, transparency, and accountability. The Company encourages all employees and contractors to raise genuine concerns regarding suspected wrongdoing, unlawful conduct, risks to health and safety, unethical behaviour, or other malpractice affecting the Company, its employees, patients, clients, suppliers, or the public.

The purpose of this policy is to:

- Encourage individuals to report concerns at an early stage;
- Provide a clear process for raising concerns;
- Ensure concerns are investigated appropriately and fairly;
- Protect individuals from retaliation or detrimental treatment where concerns are raised in good faith;
- Support compliance with applicable UK legislation and recognised standards of corporate governance.

This policy supports the Company’s commitment to quality, compliance, ethical conduct, information security, and continual improvement, including obligations associated with standards and accreditations such as ISO 9001, Cyber Essentials, and SEQOHS.

## 2. Scope

This policy applies to:

- All employees;
- Directors;
- Contractors and consultants;
- Agency workers engaged by the Company;
- Temporary workers;
- Individuals working on behalf of the Company.

This policy applies regardless of seniority, length of service, or contractual status.

## 3. Legal Framework

This policy is intended to comply with:

- The Public Interest Disclosure Act 1998 (“PIDA”);
- The Employment Rights Act 1996;
- Relevant UK employment and health and safety legislation;
- Applicable data protection legislation, including the UK GDPR and Data Protection Act 2018.

Under PIDA, workers who make qualifying disclosures in the public interest may be legally protected from dismissal or detriment.

## 4. What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, malpractice, illegal conduct, or risks occurring within the Company.

A whistleblowing concern is typically raised where an individual reasonably believes that one or more of the following has occurred, is occurring, or is likely to occur:

[www.smartclinicUK.com](http://www.smartclinicUK.com)

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- Criminal offences;
- Fraud, theft, bribery, or financial malpractice;
- Breaches of legal or regulatory obligations;
- Breaches of Company policies or procedures;
- Misuse of Company funds or assets;
- Risks to health and safety;
- Risks to patients, clients, employees, or the public;
- Environmental damage;
- Unsafe clinical or operational practices;
- Data protection or information security breaches;
- Deliberate concealment of wrongdoing;
- Abuse of authority;
- Serious professional misconduct;
- Unethical behaviour;
- Harassment, discrimination, or victimisation where there is a wider public interest concern.

A whistleblowing concern may relate to actions by:

- Employees;
- Contractors;
- Suppliers;
- Clients;
- Third parties acting on behalf of the Company.

## 5. Matters Outside This Policy

This policy is not intended to replace normal management, grievance, disciplinary, bullying and harassment, or complaints procedures.

Issues relating solely to an individual's personal employment circumstances should normally be raised under the relevant HR policy.

Examples include:

- Pay disputes;
- Interpersonal conflicts;
- Performance management concerns;
- Individual contractual disputes.

However, where a personal concern also involves wider wrongdoing or public interest concerns, this policy may still apply.

## 6. Principles of the Policy

The Company is committed to ensuring that:

- Concerns can be raised without fear of retaliation;
- All concerns are taken seriously;
- Concerns are assessed objectively and fairly;
- Appropriate confidentiality is maintained;
- Investigations are conducted proportionately;
- Individuals raising concerns are treated respectfully;

- No worker suffers detrimental treatment for raising a genuine concern in good faith.

## 7. Protection From Retaliation

No employee or contractor will suffer dismissal, disciplinary action, threats, victimisation, discrimination, loss of opportunity, or any other detrimental treatment because they have raised a genuine concern in good faith.

Detrimental treatment includes:

- Dismissal;
- Demotion;
- Reduction in work;
- Loss of promotion opportunities;
- Harassment or intimidation;
- Unfavourable treatment;
- Damage to professional reputation.

Any employee found to have retaliated against a whistleblower may be subject to disciplinary action, up to and including dismissal.

Contractors or third parties engaging in retaliatory conduct may have their contracts terminated.

Protection under this policy applies even if an investigation concludes that no wrongdoing occurred, provided the concern was raised honestly and reasonably.

## 8. Confidentiality

The Company will make every reasonable effort to protect the confidentiality of individuals raising concerns.

Information relating to a disclosure will only be shared where necessary for:

- Proper investigation;
- Legal compliance;
- Safeguarding obligations;
- Regulatory reporting;
- Disciplinary or legal proceedings.

Individuals should be aware that it may not always be possible to guarantee anonymity during an investigation, particularly where evidence or witness statements are required.

All parties involved in a whistleblowing investigation are expected to maintain appropriate confidentiality.

## 9. Anonymous Disclosures

The Company encourages individuals to identify themselves when raising concerns, as this usually assists effective investigation and communication.

Anonymous disclosures may still be considered, taking into account:

- The seriousness of the allegation;
- The credibility of the information provided;
- The likelihood of obtaining sufficient evidence;

- The practicality of conducting a fair investigation.

The Company may be limited in its ability to investigate anonymous allegations fully.

## 10. Malicious or False Allegations

Individuals raising concerns are expected to do so honestly and in good faith.

No action will be taken against an individual who raises a concern genuinely and reasonably, even if the concern is not substantiated following investigation.

However, deliberately false, malicious, frivolous, or vexatious allegations may result in disciplinary action and, where appropriate, legal action.

## 11. How to Raise a Concern

Concerns should normally be raised as soon as possible after the issue arises.

Disclosures may be made verbally or in writing.

Where possible, individuals should provide:

- A clear description of the concern;
- Relevant dates, times, and locations;
- Names of individuals involved;
- Any supporting evidence or documentation;
- Details of any previous attempts to raise the concern.

Concerns should normally be raised with:

- The Chief Executive Officer (CEO); or
- A Company Director.

If the concern involves the CEO, the individual should report the matter directly to another Company Director or member of Senior Management.

## 12. Investigation Process

Upon receiving a whistleblowing concern, the Company will:

- Acknowledge receipt of the concern where appropriate;
- Conduct an initial assessment;
- Determine the appropriate course of action;
- Appoint an investigating officer where necessary;
- Conduct an investigation proportionate to the nature of the concern.

Investigations may involve:

- Interviews with relevant individuals;
- Review of records and systems;
- Collection of documentary evidence;
- External advisers or specialists;
- Referral to external authorities where appropriate.

The Company may decide that concerns should instead be managed under another internal process, including:

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- Disciplinary procedures;
- Grievance procedures;
- Safeguarding procedures;
- Information security incident procedures;
- Complaints processes.

### 13. Investigation Outcomes

Following investigation, the Company may decide to:

- Take no further action;
- Implement corrective actions;
- Introduce process improvements;
- Initiate disciplinary action;
- Refer matters to external authorities;
- Report matters to insurers, auditors, or legal advisers;
- Notify affected parties where appropriate.

Where possible and lawful, the individual raising the concern will be informed that the investigation has concluded and whether appropriate action has been taken.

The Company may be unable to disclose full details due to confidentiality, legal, or data protection obligations.

### 14. Timescales

The Company will aim to investigate concerns promptly and proportionately.

Due to the varying nature and complexity of whistleblowing matters, specific investigation timescales cannot always be guaranteed.

However, the Company will normally aim to:

- Acknowledge concerns within 5 working days where contact details are available;
- Conduct an initial assessment promptly;
- Keep the reporting individual appropriately informed of progress where practicable.

### 15. External Disclosure

The Company encourages concerns to be raised internally in the first instance.

However, nothing in this policy prevents an individual from making a protected disclosure to an appropriate external body where permitted by law.

Depending on the nature of the concern, appropriate external authorities may include:

- The Health and Safety Executive (HSE);
- The Information Commissioner's Office (ICO);
- HM Revenue & Customs (HMRC);
- The Police;
- The Environment Agency;
- Relevant professional bodies;
- Other prescribed persons under UK whistleblowing legislation.

Employees are encouraged to seek independent advice before making external disclosures.

## 16. Record Keeping

The Company will maintain appropriate records of whistleblowing concerns, investigations, and outcomes in accordance with:

- Data protection legislation;
- Confidentiality obligations;
- Information retention requirements.

Records will be securely stored and access restricted to authorised individuals only.

## 17. Data Protection

Personal data processed under this policy will be handled in accordance with the UK GDPR, Data Protection Act 2018, and the Company's Data Protection and Information Security policies.

Information will only be processed where necessary and proportionate for the purposes of investigation, compliance, safeguarding, or legal obligations.

## 18. Related Policies and Procedures

This policy should be read alongside other relevant Company policies, including:

- HR Policy;
- Equality and Diversity Policy;
- Anti-Bribery and Corruption Policy;
- Data Policy;
- Cyber Security Policy;
- Formal Feedback Policy;
- Safeguarding Policy;
- Health and Safety Policy;
- Incident Reporting Procedures.

## 19. Monitoring and Review

The Company Director is responsible for the implementation and periodic review of this policy.

The policy will normally be reviewed annually, or earlier where:

- There are legislative or regulatory changes;
- Organisational changes occur;
- Lessons learned from incidents or investigations require amendment.