



Whistleblowing Policy

1. Introduction

This policy applies to all employees and officers of Micro Systems (UK). Other individuals performing functions in relation to Micro Systems (UK), such as agency workers and contractors, are encouraged to use it.

Micro Systems (UK) is firmly committed to conducting its business and working with employees, customers, suppliers and shareholders in a manner which is lawful and ethically responsible. This policy formalises Micro Systems (UK)'s commitment to enabling all employees to promptly and fairly inform their managers of any instances in which they have reason to suspect that the company as a whole is engaging in inappropriate practices. Each line of business is accountable for adequately communicating this policy's procedure to all of its personnel.

If employees suspect malpractice may be taking place, they should not be afraid to "speak out" or "blow the whistle".

2. Aim

The aim of the policy is to provide trustees, employees and other partners the confidence to voice any significant concerns they may have about other people or Micro Systems (UK) without fear of retaliation or other negative consequences.

In the event of concerns regarding serious malpractice, violations of regulations, or criminal offences, the policy will ensure that everyone is aware of what to do and who to contact. It will also permit investigations into cases where there is a "reasonable belief" that malpractice is occurring or may be occurring.

3. What is Whistleblowing?

'Whistleblowing' is defined by the UK Whistleblowing Commission as 'the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrongdoing which affects others'.

All employees may occasionally worry about things that are happening at work. These issues are often addressed by information sharing and informal talks with the line manager or other senior individuals. When someone thinks that using the informal path is not the best course of action, they make a formal disclosure.

4. Protection of the whistle-blower

Micro Systems (UK) is committed to the Whistleblowing Policy and individuals are encouraged to voice their complaints against malpractice within the framework of the policy. Any concerns will be addressed carefully, and this policy will be followed.

People may worry that by disclosing legitimate whistleblower concerns, they may expose themselves to risk. Micro Systems (UK) will not tolerate the victimisation, intimidation, or punishment of anybody who voices a real complaint, anyone participating in the ensuing inquiry, or anyone serving as a witness.

Employees who make a "protected disclosure" (i.e., a legitimate whistleblower case) are protected from being discriminated by their employer under The Public Interest Disclosure Act 1998 (PIDA).

5. Procedure

Employees with concerns can informally inform their managers via a written or vocal dialogue. The matter will be handled confidentially. If the manager is unable to handle it, they will refer it to their director or the next-highest ranking individual at Micro Systems (UK).

The employee may bring their complaint to their director if they believe the manager is the wrong person to discuss it with. If the director is involved, the employee, manager, or relevant senior managers may raise the issue with the trustees so they may look into it and take necessary action.

If the person is undecided whether to follow this approach or start a whistleblower action and feels uncomfortable communicating with the supervisors, they can get impartial assistance by calling the nonprofit Public Concern at Work at 0207-404-6609 or on their website at www.protect-advice.org.uk. In addition, Public Concern at Work will be in a position to advise people on whether, in their judgement, disclosing information to a third party is prudent, would be suitable, and under what conditions they should think about contacting a third party and how.

All complaints will be looked into and resolved as necessary. The engaged manager will make sure the director is informed and involved as necessary (unless the directors themselves is implicated, in which case the chair of the board of trustees). The outcome of the investigations and what, if any, action has been done will be communicated to the employee who first brought up the issue or concern.

If the employee is dissatisfied with the investigation's timeliness, manner, or conclusion, they should write to the director and express their concerns. If the director is personally involved, they should write to the chair, if not, they should write to another trustee. The director (or chair or other trustees) will look into the complaint and let the employee know what they found out and what, if any, action has been done or will be taken as a result.

If the employee has cause to suspect that the right course of action has not been pursued, he or she should notify the relevant authorities. Numerous organisations to which qualified disclosures may be made are listed in the Act, including The Financial Conduct Authority (formerly the Financial Services Authority), The Competition and Markets Authority, The Health and Safety Executive, The Environment Agency, The Independent Police Complaints Commission, and The Serious Fraud Office.

6. Formal concern report

Employees and connected parties should be reminded of their need to maintain confidentiality with regard to Micro Systems (UK) and its clients after deciding to carry out a formal disclosure. All formal concerns must be brought to the director or chair's attention in writing (by letter or email), or to another trustee if it is inappropriate to engage the director or chair. The director or chair will address the disclosure in accordance with the established processes. The term "Appropriate Person" refers to the recipient of the disclosure and will be used consistently throughout this policy.

Employees must provide a "protected disclosure" in order to be eligible for protection under PIDA. There are three basic components to this:

- The employees must provide information of a concern that they "reasonably believe" shows a category of wrongdoing set out in the law;
- The employees must reasonably believe that the concern is in the public interest;
- The employees must raise the concern in accordance with the law – either internally to the employer or externally to an outside body.

7. When is whistleblowing malicious?

Whenever it is determined that the claims made by the whistleblower are made with malice, and:

- Acts against the interests of the public;
- Makes a claim without having a good faith basis for thinking it is largely true;
- Makes an allegation for personal or third party advantage;
- Or inappropriately gathers information to support the charges.

If unlawful activity happened in order to accomplish such goals, they may be subject to official disciplinary action, which may include dismissal, and in some situations, a criminal inquiry.

Additionally, it is doubtful that the employee will receive whistleblower protection under the PIDA Act if this requirement is satisfied or if they act improperly in connection with whistleblowing.

8. Anonymous disclosure

If requested, the identity of the person making the disclosure shall be kept private for as long as practicable, providing that doing so is compatible with a thorough inquiry. It is deemed preferable that they reveal their identity due to the protection provided to someone who raises a legitimate issue. However, there may be unique or exceptional situations when a person feels the need to make an anonymous disclosure.

If an anonymous disclosure is made, it will be accepted and handled similarly to those who provide their names. An individual should not be discouraged from making an anonymous disclosure if they feel that doing so is the best course of action for them. Anonymous claims can occasionally be harder to investigate because there is no way to contact claimants to discuss the outcome of the investigation or request additional information during the investigation.

Appendix

The Public Interest Disclosure Act 1998 (PIDA)

The Public Interest Disclosure Act of 1998, or PIDA for short, protects whistleblowers from unfavourable treatment and wrongful termination. It is part of The Employment Rights Act of 1996 (ERA).

An employee cannot be fired or subjected to retaliation because they have reported a concern to management in violation of PIDA. Making a "protected disclosure" is another term for voicing a whistleblower concern. PIDA grants whistleblowers privileges from the very beginning. This indicates that the employee is exempt from the two-year service requirement for other employment rights.

A "reasonable belief" is sufficient to serve as the foundation for concerns; and the employee does not need to have evidence that such an act is being done, has been committed, or is likely to be committed. Some examples could include:

- Criminal offences;
- Fraud, corruption, or poor financial management;
- Misrepresenting financial products or pensions;
- Abuse of vulnerable populations;
- Practises that endanger the customers' or employees' health and safety;
- Not adhering to legal requirements;
- Violations of legislation, the Data Protection Act, for example;
- Concealing medical malpractice;
- Causing environmental harm;
- Concealing any of the aforementioned.

By raising the issues internally, the employees are communicating with their employer. Their line manager, a senior manager, or a whistleblower contact—anyone in the organisation who is more senior than the employees—can be considered the employer. When they voice the concerns inside, it is rather simple to be granted protection.

Externally raising concerns is communicating the complaints to anyone other than their employer. This is divided into two categories: expressing the concerns to a Prescribed Person (a regulator required by law to address issues; this includes their MP) and making more extensive disclosures (anyone outside of the employer who is not prescribed, i.e. the police, the media etc). When the employees see a designated person, it is rather simple to become eligible for protection. However, it becomes more challenging as the employees make broader disclosures since the requirements are more demanding.

It is a violation of the employees' legal rights under PIDA if they make a protected disclosure and are treated unfavourably in any manner as a result. The employees might be able to make use of their legal options and file a claim for compensation at Employment Tribunal.