Whistleblowing Policy and Procedure

Scope

CMC Partnership Consultancy Ltd ('CMC') supports businesses to achieve their transformation aims through the provision of change management consultancy services.

CMC policies provide a framework for corporate governance. Policies, corporate statements and procedures are reviewed on a regular basis to ensure they meet the needs of the business, including all regulatory, audit and contractual compliance requirements. Changes to policy will be communicated and further training provided if required.

Roles and responsibilities

- Company directors are responsible for creating an organisational culture which supports delivery of the company's policy objectives.
- Business and line managers provide policy awareness through induction and ongoing training.
- All employees and users of company IT services have a responsibility to adhere to company policy.
- Parties working on behalf of CMC – sub-contractors, third party suppliers and business partners – will be contractually required to comply with specific policies and procedures: Anti-Bribery & Corruption, Environmental, Health & Safety, and Equality policies, CMC's Modern Slavery Statement. Anti-Bullying, Harassment & Acceptable Use and the Information Security Management, Digital & Social Media policies may also apply, depending upon the level of engagement. These documents will be made available on CMC's website, or shared directly with third parties as defined in their contractual agreements.

Non-adherence to CMC policies, associated procedures and formal guidance may result in disciplinary action, including dismissal or contract termination. It may also invoke criminal and/or civil penalties.

This policy set is provided to staff as part of the company's induction process and is shared annually as a refresher to all permanent employees. Recipients are required to sign for receipt and understanding and encouraged to request further information and/or training at any time via their line manager.

This policy set was reviewed and approved by the CMC Operations Board.

Date: 22.09.2026

Signed by: Jeanette Lane, Director



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Whistleblowing Policy

CMC is committed to the highest standards of quality, honesty, openness and accountability. CMC seeks to conduct our affairs in a responsible manner taking into account the requirements of our staff, customers and the protection of society in general. CMC believes it has a duty to take appropriate measures to identify any wrongdoing within the firm and attempt to remedy them.

It is a fundamental term of every contract of employment that an employee will serve their employer and not disclose confidential information about the employer's affairs, **but it is your responsibility to raise any concerns that you may have about malpractice in the workplace**, and you are expected to raise such concerns internally in accordance with this policy.

Where an individual discovers information which they believe shows malpractice or wrongdoing within CMC, this information may be disclosed independently of line management and without fear of reprisal and CMC wishes to assure you that it will take all reasonable steps to protect you from any form of retribution, victimisation, harassment, or detriment.

It is impossible to give an exhaustive list of the activities that would constitute malpractice. Broadly speaking CMC would expect you to report past, present or future suspected wrongdoing or dangers at work, these may include:

- Criminal activity.
- Danger to health and safety.
- Damage to the environment.
- Bribery or corruption.
- Failure to comply with any legal or professional obligations or regulatory requirements.
- Financial fraud or mis-management.
- Negligence.
- Breach of our internal policies and procedures.
- Conduct likely to damage CMC's reputation.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of any of the above.

If you are in doubt as to whether any matters which are of concern to you come within the scope of this policy, CMC encourages you to raise them.

This policy is intended to provide a method of resolving issues and ensuring the highest standards of integrity by working within CMC and avoiding the need to raise issues externally with customers or in the media.

The protection afforded by this policy does not extend to you if you maliciously raise a concern that you know to be untrue.

The policy is not designed to question financial or business decisions unless they involve malpractice or impropriety, nor may it be used to reconsider any matters which have already been addressed under harassment, complaint or disciplinary procedures.

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You have statutory protection if you raise concerns in the right way. Providing you are making a disclosure in the public interest and in line with relevant legislation, CMC will take your concern seriously and it does not matter if you are mistaken.

Whistleblowing Procedure

Our whistleblowing policy is designed to provide reassurance to our staff and partners that concerns which need to be raised can be reported internally which we will resolve with you without the need to report these externally.

For transparency this supporting procedure covers both routes, although it is hoped external reporting will never be called for.

Internal reporting process

1. You should report concerns about any form of malpractice in the first instance to your line manager. If, for whatever reason, you feel you cannot speak with your manager about your concern or if you think your concern has not been handled properly, then you should raise your concern with a director.
2. Once you have told us of your concern, we will look into it carefully and thoroughly to assess what action, if any, should be taken. Depending on the subject matter of the disclosure, this may mean an internal inquiry or a longer investigation.
3. You will be told who will be conducting the investigation and how long it is likely to last. You will be kept informed of developments and of the outcome of the investigation to the extent that this is appropriate and practicable in the circumstances.
4. However, the need for confidentiality may prevent us from being able to give you specific details of the investigation or actions taken.
5. We will aim to carry out the investigation in a timely manner. Depending on the findings of the investigation, internal and/or external procedures may be invoked to ensure the appropriate action is taken.

External reporting process

We recognise that you may prefer to make an anonymous report, however you are encouraged not to do so. Although all reports, anonymous or otherwise, will be investigated, proper investigation may prove impossible if further information cannot be obtained from you.

In serious circumstances or following an internal report which has not been addressed it may be appropriate for you to report your concerns to an external body. We would rather you raise a legitimate concern with the appropriate regulator than not at all.

Information and advice is available from an independent charity called Protect.

Confidentiality

We will make every effort to keep your identity confidential if this is desired. However, there may be circumstances in which, because of the nature of the

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investigation or disclosure, it will be necessary to disclose your identity. If this is the case, we will make efforts to inform you that this is likely to be the case and will take all reasonable steps to protect you from any victimisation or detriment as a result of having made a disclosure.

In order not to jeopardise the investigation into the alleged malpractice, you will be expected to not tell anyone else.

Untrue allegations

If an individual makes an allegation in the public interest and in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. If, however, an individual makes malicious or vexatious allegations, and particularly if they persist in making them, disciplinary action may be taken against the individual concerned.

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