



Statement and Purpose of Policy

1. Cobras AP Ltd (the Employer, we, our or us) is committed to upholding and providing information about our Staff Members' rights in relation to making qualified and protected disclosures (i.e. whistleblowing), to help our organisation operate with honesty and integrity.
2. We expect all Staff Members to maintain high standards; however, we recognise that all organisations face the risk of things going wrong from time to time and the risk of unknowingly harbouring illegal or unethical conduct.
3. A culture of openness and accountability is essential for preventing such situations from occurring and for addressing them when they do.
4. All Staff Members should have the confidence to raise a suspected wrongdoing and should know that it will be taken seriously and investigated as appropriate.
5. Staff Members raising genuine concerns should be able to do so without fear of reprisals, even if the Staff Member turns out to be mistaken.
6. Any questions in relation to this Policy should be referred to Cobras AP Ltd in the first instance.

Scope of This Policy

7. This Policy explains the law on whistleblowing and provides Staff Members with guidance as to how to raise any malpractice or wrongdoing concerns.
8. This Policy applies to all individuals working for Cobras AP Ltd in the UK at all levels, including senior managers, officers, employees, consultants, trainees, homeworkers, part-time and fixed-term workers, casual workers, agency workers, volunteers, and interns (collectively 'Staff Members').
9. This Policy should not be used for complaints relating to Staff Members' own personal circumstances, such as complaints about how they have been treated at work. For these, Staff Members should use Cobras AP Ltd's Grievance Procedure.
10. This Policy does not form part of any contract of employment and Cobras AP Ltd may amend it at any time at its absolute discretion.



What Can be Reported Under This Whistleblowing Policy?

11. Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the 'Act').
 12. To constitute whistleblowing, a disclosure must be a 'Qualifying Disclosure' under the Act, meaning the Staff Member must reasonably believe:
 - the disclosure is in the public interest, and
 - the alleged wrongdoing is happening, has happened, or will happen.
 13. Examples of qualifying disclosures include concerns about:
 - Criminal activity
 - Miscarriages of justice
 - Danger to health and safety
 - Damage to the environment
 - Failure to comply with any legal obligation
 - Bribery
 - Financial fraud or mismanagement
 - The deliberate concealment of any of the above matters
 14. A whistleblower is a person who raises a genuine concern relating to any of the above.
 15. The Act covers concerns raised by workers and employees only.
 16. If you have genuine concerns related to suspected wrongdoing or danger affecting any of Cobras AP Ltd's activities, you should report it following the procedures in this Policy.
 17. If you are uncertain whether something falls under this Policy, seek advice from Cobras AP Ltd.
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How to Raise a Whistleblowing Concern

18. For a Qualifying Disclosure to be a 'Protected Disclosure' under the law, it must be made in the correct way. The recommended steps are:
 - Raise concerns with Cobras AP Ltd directly, in person or in writing.
 - Cobras AP Ltd may resolve the concern or refer it to another department.



19. If the matter is serious, or if you feel Cobras AP Ltd has not addressed your concern, or you prefer not to raise it with them, contact the person or department responsible for the area of concern within Cobras AP Ltd.

Wider Disclosures

20. This Policy provides an internal process for reporting, investigating, and remedying wrongdoing.
21. In most cases, it should not be necessary to report concerns externally.
22. However, in some circumstances, it may be appropriate to report to an external body (e.g., a regulator).
23. It is very rarely appropriate to alert the media. Seek legal advice before reporting externally.
24. Unique rules apply when making external disclosures, including:
- The disclosure must be substantially true
 - The whistleblower must not be acting for personal gain
 - It must be reasonable to make the disclosure under the circumstances
25. Contact Cobras AP Ltd for advice about external disclosures.

How Cobras AP Ltd Will Respond to Disclosures

26. Once a concern is raised, it will be assessed to decide on initial action or investigation. You will be advised:
- Who is handling the matter
 - How to contact them
 - Whether further assistance or information is required
27. You may be asked to attend additional meetings to provide further information and may bring a colleague or union representative. Your companion must respect confidentiality.
28. All allegations will be thoroughly investigated. Investigations may take time depending on complexity. Progress updates will be provided where possible.
29. Confidentiality needs may prevent sharing specific details of the investigation or outcomes. You should treat all related information as confidential.



- 30. If false allegations are made maliciously or for personal gain, disciplinary action may be taken under the Disciplinary Procedure.
 - 31. The outcome you seek cannot be guaranteed, but all concerns will be handled fairly and appropriately.
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Assurances

- 32. We are committed to this Policy and encourage all staff to voice concerns openly.
 - 33. If you fear reprisal, additional confidentiality measures can be taken.
 - 34. The law protects Staff Members from detrimental treatment (e.g., dismissal, disciplinary action, threats) resulting from raising a whistleblowing concern, even if mistaken.
 - 35. Cobras AP Ltd will take care to avoid any detrimental treatment.
 - 36. If you believe you have suffered detriment, inform Cobras AP Ltd immediately. If unresolved, raise it via the Grievance Procedure.
 - 37. Staff Members must **not** threaten or retaliate against whistleblowers. Such conduct may lead to disciplinary action.
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Last reviewed: June 2025

