



Whistleblowing Policy

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1 Introduction

Serica Energy plc (“**the Company**”) is committed to maintaining the highest standards of honesty, openness and accountability and recognise that you have an important role to play in achieving this goal.

Employees can often be the first to know when someone inside or connected with an organisation is doing something illegal or improper, but they can feel apprehensive about voicing their concerns. This may be because they worry that speaking up would be disloyal to their colleagues or the organisation itself; or it may be because they do not think that their concerns will be taken seriously because they are afraid that they will be bullied or dismissed. **However, the Company does not believe that it is in anyone’s interest for employees with knowledge of wrongdoing to remain silent.**

The aim of this Whistleblowing Policy (the ‘Policy’) therefore is to provide a mechanism for reporting, investigating, and remedying wrongdoing. The Company takes reports of wrongdoing extremely seriously and you will not be criticised or reprimanded for reporting a concern.

2 Who is covered by the Policy?

The Policy applies to all individuals working at all levels of the organisation, including but not limited to directors, officers, senior managers, employees, consultants, contractors, trainees, home workers, part-time and fixed-term workers, casual and agency staff (collectively referred to as “**staff**” in this Policy).

3 What is whistleblowing?

Whistleblowing is making a disclosure in the public interest. It means that if you believe there is wrong-doing, you can report this by following the correct processes and your employment rights are protected.

Wrong-doing may include:

- Criminal activity
- Bribery
- Failure to comply with legal obligations
- Financial fraud or mismanagement
- Negligence
- Corruption
- Theft
- Financial Mismanagement
- Discrimination (statements based on age, race, colour, national origin, sexual orientation, gender, disability or religion)
- Harassment (statements, conduct or actions that are uninvited, degrading, offensive, humiliating or intimidating)

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- Retaliation or Retribution (statements or actions against a person because of any lawful act taken by that person in connection with reporting a violation of law or policy, filing a complaint, or assisting with an investigation or proceeding)
- Bullying (the use of force, threat, or coercion to abuse or intimidate a person)
- Breach of our internal policies and procedures including our Anti-Corruption and Bribery policy
- Miscarriages of justice
- Actions which endanger the health or safety of staff or the public
- Conduct likely to damage our reputation
- Unauthorised disclosure of confidential information
- Actions which are intended to deliberately conceal any of the above

A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities you should report it under this Policy.

However, this Policy should not be used for complaints arising out of or associated with your contract of employment, for which you should use the grievance procedure which can be located on the company intranet within the Business Management System.

4 How do I make a report?

The Company hopes that you can raise your concern openly and make a report orally or in writing to your line manager, who may be able to agree a way of resolving your concern quickly and effectively. You may prefer to raise your concerns to the Human Resources representatives in circumstances where you feel you cannot raise the matter with your Line Manager.

However, if you wish to speak to someone in confidence or you feel that you cannot raise the matter within the Company then you may use the SeeHearSpeakup service and, if you do not wish to disclose your identity, this will not be done without your consent, unless required by law.

SeeHearSpeakUp is a third-party independent company specifically contracted by the Company for this Policy. Further information about the service and how to use it can be found on the Company intranet.

In the event you cannot or do not wish to access the Company intranet, you can:-

- Ring the independent external helpline number on **0800 056 2539**
- Complete an online web report via the SeeHearSpeakUp website - **www.seehearspeakup.co.uk/en/file-a-concern**
- email your information to **report@seehearspeakup.co.uk**

5 How will my report be investigated?

If you have reported your concern internally, without using the SeeHearSpeakUp process, the Human Resources team will assess it and consider what action may be appropriate. This may involve an informal review with a meeting to discuss your concerns, an internal inquiry or a more formal investigation. You will be able to be accompanied to any meetings by a friend of your choosing if you wish. Your concerns will be investigated and then the Company will reach a decision in relation to your concerns which it will confirm in writing to you. If you are unhappy with the outcome you can appeal against the decision. The appeal will be considered by a person, at the same level, or more senior to the person making the original decision. That person's decision will be final.

Subject to any relevant legal constraints, the Company will inform you of the outcome of its enquiries, the results thereof, including any action taken.

Should you make a report confidentially via the SeeHearSpeakUp process a report will be compiled by SeeHearSpeakup and shared in confidence with a senior person within the Company who is authorised to receive such information. You may choose the senior person the report is shared with, who may be any Director (executive or non-executive director) of the Company. The senior person will evaluate the report and establish the next steps to be taken. You may choose to remain anonymous when using the SeeHearSpeakUp process. Subject to any relevant legal constraints SeeHearSpeakup will keep you informed of the senior person's enquiries and results thereof including any action taken.

Whichever route is utilised to investigate your concern, a report, respecting personal confidentiality as appropriate, will be made to the Board of Directors and you will be advised of this.

6 Reporting to external parties and regulators.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as an agent, supplier, or a public official. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first by contacting your manager or one of the other individuals set out above for guidance or by using the SeeHearSpeakup service.

7 Confidentiality and Anonymity

We hope that staff will feel able to voice whistleblowing concerns openly under this Policy. However, if you want to raise your concern confidentially and anonymously, you can use the SeeHearSpeakUp process. Whichever route is followed, we do not encourage staff to make disclosures anonymously as proper investigation may be more difficult or impossible if those investigating the matter cannot obtain further information from you. Anonymity can also make it more difficult to establish the credibility of allegations. To be clear, you may remain anonymous and may raise your concern confidentially if you wish to do so via the SeeHearSpeak process.

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8 What can I do if I am unhappy with the way my concern has been dealt with?

We will try to ensure that your concern is properly considered and dealt with in an appropriate way but of course we cannot guarantee the outcome you may be seeking.

If you are unhappy with the outcome, you may of course raise your concern with an external organisation, such as a relevant regulator or a legal adviser.