

Speak Up – Serious Concerns Policy

Edinburgh Airport Limited is committed to providing an ethical, moral, and safe working environment for all employees, which is based on fairness, honesty and corporate responsibility. However, we recognise that from time to time, employees may have genuine reasons to believe that something is seriously wrong within the workplace. This policy primarily covers how to deal with such serious concerns, where the interests of others or that of the organisation itself is at risk.

As an organisation we are keen to foster an open environment in which all our employees feel confident and able to speak up about serious concerns without fear of victimisation or detriment. This policy applies to all Edinburgh Airport Limited employees, permanent or temporary, consultants, agency workers and contractors.

The legislation which covers this Policy is the Public Interest Disclosure Act ((PIDA) 1998) and provides statutory protection against dismissal and victimisation for all employees who speak out about genuine concerns in the workplace.

Examples of what would could be considered as a disclosure and therefore covered by this Policy are as follows:

- Failure to comply with a legal duty
- Miscarriages of justice
- Criminal offences
- Terrorist activity
- Endangering the health and safety of any person
- Damage to the environment;
- Welfare and Security of Passengers
- Giving, promising to give, requesting or receiving bribes; and
- Deliberate concealment of any of the above.

The examples above are not exhaustive

In disclosing a concern you must have reasonable belief that a wrongdoing has been committed, or is in the process of being committed or is likely to be committed, and would therefore qualify for protection under PIDA.

We all have a responsibility:

Staff and others working at Edinburgh Airport Limited

- To be aware of this policy and procedures and use it when making the decisions listed above
- When raising any concerns tell us if you have a direct personal interest in the matter

Managers

- To make their staff fully aware of this policy and procedures
- To encourage and promote a positive open working culture for staff and others working at Edinburgh Airport Limited so people feel able to easily express their concerns

- To take all concerns seriously
- To guide staff to the most appropriate route for raising their concerns
- To refer concerns raised under this policy to Safecall (details below of contact number)
- To refer concerns to the Compliance, Sustainability and Systems Director or the Head of Human Resources within five working days

Directors

- To acknowledge receipt of disclosure to the whistleblower within 7 working days
- To indicate to the whistleblower, where possible, how management proposes to investigate the disclosure and the likely timescales
- In so far as possible to keep the whistleblower informed of progress at all stages of the process
- To take concerns seriously, to consider them fully and fairly
- To resolve issues as sensitively and speedily as possible
- To communicate the findings where possible, to the whistleblower, the individual(s) under investigation and, if appropriate, members of the Edinburgh Airport Limited management and/or other external authorities
- To keep a confidential log to assess effectiveness of the policy and any emerging trends
- To provide periodic anonymised reports on disclosures to the Chief Executive for inclusion in his annual report to the Board

Employee Representatives and Trade Unions

- To advise staff how and with whom to raise concerns when they arise
- To provide advice and support to staff at any stage of the process

How to raise concerns:

Option One: normal route

Tell your immediate manager. This can be done either face to face or in writing. You should make it clear that you are raising your concern as part of our whistleblowing procedure. At any stage you can be accompanied by:

- a fellow employee of your choice
- an employee representative; or
- a full time officer employed by a Trade Union.

The matter will then be referred to the Compliance, Sustainability and Systems Director or the Head of Human Resources.

Option Two:

If the concern involves your immediate manager, Head of Department or Director, or for any reason you would prefer them not to be told, you may raise the matter directly with the Compliance, Sustainability and Systems Director or the Head of Human Resources.

Option Three:

- If you have disclosed your worry internally and you are concerned either by the response or lack of response, or
- You feel unable to talk to anyone internally for whatever reason, and
- The concern falls within the description given in paragraph 4,

you can contact Safecall (our Independent External Reporting Service) for confidential advice. Safecall provide 24 hour personal support and are experienced in handling concerns that are of a sensitive nature. They can be contacted on 0800 915 1571.

Safecall will investigate in whatever way they consider appropriate, but are likely to contact Edinburgh Airport Limited, and the Compliance, Sustainability and Systems Director or the Head of Human Resources will be informed to discuss the disclosure.

The above routes are not designed to replace the Company Grievance or Consultative Arrangements, but evidence gathered may lead to the use of other procedures such as the disciplinary procedure and audit procedure.

Next Steps:

Edinburgh Airport Limited commits to carry out a prompt and thorough investigation into genuine concerns raised. All concerns raised will be treated sensitively and, where requested, every effort will be made not to disclose your identity as stated in paragraph 9. If disclosure is necessary, we will discuss this with you.

Once we have completed our investigations:

Wherever possible, the Compliance, Sustainability and Systems Director or the Head of Human Resources will ensure that the final outcomes of the investigation are communicated to:

- You, as the person raising the wrongdoing concern;
- The individual(s) under investigation; and, if appropriate,
- Members of the Edinburgh Airport Limited management or other external authorities who may need to consider whether action should be taken on the basis of the findings.

Confidentiality:

Employees have a right to raise a concern in confidence, but concerns which have been raised anonymously will be more difficult to look into. Where the allegations have been made against an individual/s and in the spirit of fairness they have the right to know who is making the allegations against them.

If an employee asks for their identity to be protected we will respect this, wherever possible. If the situation arises where it is not possible to resolve the matter without revealing the identity of

the employee who raised the concern (for instance, evidence is needed in court), we will discuss with the employee whether and how the case can go forward. Anonymity cannot be respected if this would have an adverse effect on any serious criminal proceedings.

Protection from victimisation:

Edinburgh Airport Limited will not tolerate any discrimination, bullying, harassment or victimisation of employees who raise concerns about malpractice or illegal acts (including informal pressures), and will consider this as a serious disciplinary offence, which may lead to dismissal.

False Allegations:

Should it become clear that an employee has maliciously or deliberately raised a matter they know to be untrue, they may be subject to disciplinary action, which could result in dismissal.

Review and Monitoring:

Confidential reports will be kept of all matters raised through this policy and the Executive will receive annual reports with an assessment of the effectiveness of the policy.

Should you have any questions on this policy you can contact your manager or Human Resources.

Communication & Employee Awareness:

This policy will be communicated to all employees using the following methods:

- Company Intranet
- Poster and Leaflet Campaign
- Induction Training
- Management Briefings