



# ESG Pro Ltd

## Whistleblowing Policy

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## **1 Purpose and scope**

- 1.1 All organisations face the risk of things going wrong or of unknowingly harbouring malpractice.
- 1.2 ESG Pro Ltd (hereinafter the Company) takes malpractice very seriously. We encourage open communication from our directors and employees. We want you to feel secure about raising your concerns.
- 1.3 All employees have statutory protection if they raise concerns in the right way. This policy is designed to give staff that opportunity and protection.
- 1.4 It does not matter if you are mistaken. You do not have to prove anything about the allegation you are making but you must reasonably believe the information you have tends to show some malpractice.
- 1.5 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.
- 1.6 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## **2 When to use this policy**

- 2.1 There is a difference between whistleblowing and raising a grievance:
  - 2.1.1 whistleblowing is where you have a concern about a danger or illegality that has a public interest aspect to it, e.g., because it threatens clients, third parties or the public, and
  - 2.1.2 a grievance or complaint generally relates to your own employment position and does not have an additional public interest dimension.
- 2.2 This policy is not the procedure for general grievances. If you have a complaint about your own personal circumstances, you should use the normal grievance procedure.
- 2.3 Please refer to our separate Anti-money laundering and counter-terrorist financing policy for reporting concerns about such issues instead of the process set out here.
- 2.4 Please refer to our separate Anti-bribery and corruption policy for reporting concerns about such issues instead of the process set out here.

## **3 The sort of concerns covered by this policy**

- 3.1 The types of concerns covered by this policy are:



- 3.1.1 that a criminal offence (including fraudulent and corrupt behaviour, e.g., theft fraud or malpractice) has been, is being or is likely to be committed except those offences relating to money laundering, terrorist financing, bribery and corruption, which should be reported using the procedure set out in the relevant separate policy,
- 3.1.2 miscarriages of justice,
- 3.1.3 an act creating risk to the health and safety of any individual,
- 3.1.4 an act causing damage to the environment,
- 3.1.5 deliberate concealment of any of the above.

#### **4 Our guarantee**

- 4.1 The Company is committed to this policy.
- 4.2 If you use this policy to raise a concern, we give you our assurance that you will not suffer any form of retribution or detrimental treatment. This assurance also applies to any reports or concerns raised under our separate:
  - 4.2.1 Anti-bribery and corruption policy,
  - 4.2.2 Anti-money laundering and counter terrorist finance policy.
- 4.3 We will treat your concern seriously and act according to this policy.
- 4.4 If you ask for a matter to be treated in confidence we will respect your request and only make disclosures to third parties, directors or other staff with your consent.
- 4.5 This assurance applies regardless of whether the subject matter of your concern, report or disclosure relates to this firm, a client or a third party.

#### **5 Procedure for raising concerns under this policy**

- 5.1 If you are concerned about any form of malpractice covered by this policy, you should normally first raise the issue with your immediate superior.
- 5.2 If you feel you cannot tell your immediate superior, for whatever reason, you should raise the issue with our director H Jackman.
- 5.3 If you have raised concerns and are still concerned, or if the matter is so serious that you feel you cannot raise it with either of the persons named above, you should raise the matter with the directors.
- 5.4 Concerns can be raised orally or in writing. They may be made anonymously or may include your identity.



- 5.5 If you wish to raise a concern in writing please complete the Whistleblowing report form contained in the **0**.
- 5.6 You may wish to consider discussing your concern with a colleague before you formally raise it under this policy but remember that once you have raised your concern (alone or with your colleague), in the interests of everyone involved, this is a confidential process.

## **6 Responding to concerns raised**

- 6.1 After an employee has raised a concern, we will record that concern in our central Whistleblowing report register.
- 6.2 We will then decide how to respond in a responsible and appropriate manner under this policy. Usually, this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.
- 6.3 We will keep you informed of the progress of the investigation carried out and when it is completed as appropriate, but please note that we will not be able to inform you of any matters that would infringe the duty of confidentiality owed to others.

## **7 Raising your concern externally (exceptional cases)**

- 7.1 The purpose of this policy is to give the directors and staff the opportunity and protection they need to raise concerns internally. We expect that in almost all cases raising concerns internally would be the most appropriate action for you to take.

### **7.2 Regulatory disclosures**

- 7.2.1 If, for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, you can consider raising the matter with Protect or another appropriate regulator:

<b>Regulator</b>	<b>Contact details</b>
Protect hotline	Helpline: 020 3117 2520



<b>Regulator</b>	<b>Contact details</b>
	Contact: <a href="https://protect-advice.org.uk/contact-protect-advice-line/">https://protect-advice.org.uk/contact-protect-advice-line/</a> Website: protect-advice.org.uk
Health & Safety Executive	Address: Health and Safety Executive, Alnwick House, Benton Park View, Newcastle Upon Tyne, NE98 1YX Tel: 0191 202 6300 email and website: <a href="http://www.hse.gov.uk/contact/">http://www.hse.gov.uk/contact/</a>

7.2.2 A list of the bodies currently listed as regulators for this purpose and the areas they are responsible for is available from [the Department for Business Innovation and Skills](#).

### 7.3 Wider disclosures

7.3.1 If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making a wider disclosure, e.g., by reporting the matter to the police or to the media.

7.3.2 Caution: whistleblowers who make wider disclosures of this type will only be protected (from dismissal or suffering detrimental treatment) in certain circumstances. ESG Pro Ltd recommends that employees take independent legal advice before following this course of action.

### 7.4 Client confidentiality

7.4.1 When making external disclosures, you should be aware of your obligation to keep the affairs of a client confidential unless:

- (a) disclosure is required or permitted by law, or
- (b) the client consents.

7.4.2 In most cases, when making an external disclosure it will not be necessary to divulge information that breaches client confidentiality. If you are in any doubt and do not feel that you can seek guidance internally.



## **8 Consequences of breach of this policy**

- 8.1 Those using the procedure outlined in this policy to raise a concern are assured that they will not suffer any form of retribution or detrimental treatment.
- 8.2 Any person who victimises a bona fide whistleblower will be liable to disciplinary action.
- 8.3 To ensure the protection of all our employees, those who maliciously make a false allegation will be liable to disciplinary action.

## **9 Monitoring and review**

- 9.1 We regularly monitor the effectiveness of this policy at regular intervals to ensure it is working in practice.
- 9.2 We will review this policy regularly—at least annually. We will provide information and/or training on any changes we make.

## **10 Further information**

- 10.1 Public Concern at Work is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. It is a source of further information and advice at [protect-advice.org.uk](http://protect-advice.org.uk). Public Concern at Work provides a free helpline offering confidential advice on 020 3117 2520.

## **11 Policy Review**

- 11.1.1 This Policy will be reviewed annually to ensure that it continues to meet the Company's objectives and regulatory requirements. Any changes to the Policy will be approved by the Board of Directors.

## **12 Policy Queries**

- 12.1.1 Any queries relating to this policy should be directed to the Management via email at [hj@esgpro.co.uk](mailto:hj@esgpro.co.uk)

## **13 Policy Approval and Endorsement**

- 13.1.1 This policy has been approved and endorsed by the Board of Directors and the Management. We believe that by adhering to these guidelines, we will make meaningful contributions to societal and environmental well-being.



13.1.2 This Policy supersedes all previous whistleblowing policies.

This version formalised and approved by the board of directors on **15 April 2026**

Humperdinck Jackman  
CEO

Natashia Lee  
Managing Director

<b>Version Control</b>			
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19 Jul 2024	V3.0	1 Aug 2024	H. Jackman
19 Jul 2023	V2.0	1 Aug 2023	H. Jackman
19 Jul 2022	V1.0	1 Aug 2022	H. Jackman



## APPENDIX: WHISTLEBLOWING REPORT FORM

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Reports under the Whistleblowing policy can be made orally or in writing and they may be made anonymously or include the reporter's identity.

To make a report in writing (either anonymously or including your identity) please complete this form, in as much detail as possible, and send to our Compliance officer.

<b>Type of conduct</b> (ie what was said or done?)	
<b>Individual(s)/department(s)/team(s) involved</b>	
<b>Frequency of occurrence</b>	
<b>Date(s) of occurrence</b>	
<b>Place(s) of occurrence</b>	
<b>Do you have direct knowledge of the matter being reported?</b> Yes/No If no, how did you become aware of it?	
<b>Do you know if anyone else is aware of the matter being reported?</b> Yes/No If yes, please identify them and detail how they became aware	
<b>Does the matter being reported affect you or your work?</b> Yes/No If yes, please describe how	
<b>Additional information/further comments</b>	
<b>Your signature, name and contact details</b> <b>OPTIONAL</b>	