

Whistle-blowing Policy

Version 1.0 November 2026

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Whistle-blowing Policy

1. Background

Rapid Temps Ltd ("Rapid Temps" or "the Company") is committed to conducting its business in an honest and ethical manner and to creating a culture that promotes transparency and accountability. All organisations, including Rapid Temps, are exposed to the risk of things going wrong, either unintentionally or through deliberate acts on the part of individuals.

Whistle-blowing is a process by which individuals can raise concerns about certain forms of wrongdoing while enjoying protection against reprisals, including discrimination, victimisation or harassment, where the statutory requirements for a protected disclosure are met.

In Northern Ireland, protection is provided by the Employment Rights (Northern Ireland) Order 1996, as amended. Workers must reasonably believe that their disclosure is in the public interest and tends to show one or more of the following:

- Criminal activity, such as bribery, fraud, tax evasion, money laundering or modern slavery;
- Failure to comply with a legal obligation, including National Minimum Wage or Right to Work requirements;
- Threats to the health and safety of any individual;
- Actual or potential damage to the environment;
- A miscarriage of justice; or
- Deliberate concealment of information about any of these matters.

Concerns about serious breaches of Company policies may also be raised under this policy. Statutory protection depends on the applicable legal requirements.

The legal framework was introduced by the Public Interest Disclosure (Northern Ireland) Order 1998 and amended by the Employment Act (Northern Ireland) 2016. Independent advice is available from the organisations in Appendix II.

Concerns may relate to past, current or possible future incidents or events. They may affect colleagues, clients, workers or the wider public. The person raising the concern does not have to prove wrongdoing, but must have a reasonable belief in the information disclosed.

Personal complaints and grievances should normally use the relevant complaints or grievance procedure. A concern affecting an individual may also raise a public interest issue and must not be excluded from this policy solely because it affects that individual.

Sources of further information and relevant contacts are set out in Appendix II.

2. Purpose and Scope

This policy sets out Rapid Temps Ltd's commitment to protecting individuals who raise concerns about known or suspected wrongdoing. It explains how concerns can be reported and how the Company will assess, investigate and respond to them.

The policy applies to all employees and individuals working for, or providing services to, Rapid Temps Ltd, regardless of their position. It includes permanent, fixed-term and temporary workers, agency staff, seconded staff, trainees, interns, consultants, contractors, homeworkers, casual workers, volunteers and other persons associated with the Company. The Company extends its reporting arrangements to these groups; statutory protection depends on the law applying to each person and disclosure.

This policy should be read alongside the Company's complaints, grievance, disciplinary and other applicable employment and conduct procedures.

3. Policy Statement

Rapid Temps Ltd encourages individuals with concerns about wrongdoing to raise them, secure in the knowledge that their concerns will be taken seriously. A person will not be penalised merely because a concern based on a reasonable belief proves to be unfounded.

Rapid Temps is committed to promoting awareness of whistle-blowing, providing accessible reporting arrangements and investigating reports thoroughly and fairly. Concerns may be raised anonymously, although this can limit the investigation and feedback. If a criminal offence or another breach of law is identified, the Company will report the matter to the police or an appropriate authority where required by law or otherwise appropriate.

The Company takes a zero-tolerance approach to retaliation against whistle-blowers. Threats, harassment or other reprisals may lead to action under the Company's disciplinary procedures.

4. Overview of Whistle-blowing

Definition

Whistle-blowing is the disclosure of information relating to known or suspected wrongdoing or dangers at work. Many day-to-day concerns can be resolved through line management or the complaints and grievance procedures. Where a concern falls within the categories in Section 1, or management is involved in the matter, this policy provides a route for raising and investigating it. The individual need not have conclusive evidence before speaking up.

A qualifying disclosure is defined by the applicable law and requires a reasonable belief that the disclosure is in the public interest and tends to show a relevant failure. This policy must not be used to prevent a qualifying disclosure because the matter also concerns an operational, financial, disciplinary or grievance issue. Legal protection is determined by the statutory requirements.

Urgent safeguarding or health and safety concerns should also be reported promptly through the appropriate emergency or safeguarding route. This does not remove a person's ability to make a protected disclosure about the same matter.

Confidentiality and Anonymity

Whistle-blowing reports will be handled sensitively. Information identifying the whistle-blower will be restricted to those who need it to assess or investigate the concern, or as required by law. If wider disclosure becomes necessary, the Company will discuss this with the individual where lawful and practicable. Absolute confidentiality cannot be guaranteed where legal obligations require disclosure.

Concerns may be raised anonymously. Anonymous reports will be assessed on the information provided, without being dismissed merely because the person is not identified. Anonymity may limit enquiries and prevent feedback.

Anyone concerned about confidentiality may seek free independent advice from Protect (see Appendix II). Before sending sensitive details to the Company's general mailbox, request an appropriate private contact arrangement.

Investigations and Outcomes

Concerns raised under this policy will receive an initial assessment to determine the nature and scope of the response. If contact is possible, the whistle-blower may be asked for clarification or further information. Where a matter is more appropriately addressed through another procedure, the Company will explain that route without restricting any right to make a protected disclosure.

An investigator, or investigation team, may be appointed with relevant experience or specialist knowledge. Any investigator must be sufficiently independent of the matter to assess it fairly. The investigation will consider the evidence and recommend actions to address wrongdoing and reduce the risk of recurrence.

Whistle-blowers will be kept informed of progress where contact is possible. Commercial or personal confidentiality may limit the detail that can be shared, including information about disciplinary action against another person.

Workers may obtain independent legal advice or make a disclosure to an appropriate prescribed person without Company approval. Nothing in this policy restricts a lawful protected disclosure or requires internal procedures to be exhausted first.

The Company is committed to a thorough and objective assessment, although the outcome may not satisfy every person raising a concern. Requests for review should go to an uninvolved director or an appropriately independent person. Independent advice and external reporting routes are set out in Appendix II.

Protection for Whistle-blowers

Workers who make a protected disclosure are protected by law against dismissal and detrimental treatment. Protection depends on the statutory requirements and is not conditional on following this internal procedure. Rapid Temps will not tolerate threats, victimisation, harassment or other retaliation against a person for raising a concern reasonably believed to be in the public interest.

Anyone experiencing retaliation should promptly contact an uninvolved director or seek independent advice. An employee found to have retaliated may be subject to disciplinary action. Where the concern involves a director or there is a conflict of interest, the independent routes in Appendix II remain available.

Financial and Other Incentives

Rapid Temps Ltd does not offer a financial reward for reporting under this policy. Its aim is to encourage prompt reporting so that concerns can be assessed and addressed. A report will be considered on its substance and the available evidence, and not on whether the individual expects a reward or another benefit.

Some public authorities may operate specific reward or assistance schemes. Eligibility and conditions are determined by the relevant authority. Anyone considering such a scheme should check the authority's current information and obtain appropriate advice.

No promise of a reward, witness protection or other benefit is made by this policy. The Company will not seek to obstruct lawful reporting to an external authority.

Any report should identify the facts known to the individual and distinguish those facts from assumptions or information received from others.

External Disclosures

The law provides routes for disclosures to an appropriate prescribed person or regulator, a legal adviser and, in certain circumstances, other recipients. Different legal conditions apply to different routes. Internal reporting is encouraged where suitable, but Company permission is not required for a protected disclosure. Independent advice from Protect or a legal adviser can help identify the correct route.

The law may also protect a disclosure made to another person whom the worker reasonably believes is responsible for the relevant failure. This can include a client, supplier or other third party. The statutory conditions must still be met.

NOTE: The main email address is a general Company contact, not an independently operated confidential hotline. Request a private contact before sending sensitive information.

False Allegations

No action will be taken merely because a concern based on a reasonable belief proves unfounded. Deliberately false information or fabricated evidence may lead to disciplinary action. Nothing in this policy limits statutory protection or treats a lack of good faith as automatically removing that protection.

5. Making a Whistle-blowing Report

Where appropriate, raise the concern with your line manager or a director and explain that you wish it to be treated as a whistle-blowing matter. Give the facts available to you and any relevant dates, records or names.

If this route is unsuitable, follow Appendix I or seek independent advice. You may bypass anyone involved in the concern or with a conflict of interest.

Contact info@rapidtemps.co.uk to request an appropriate private reporting arrangement. The mailbox is a general contact address. Do not assume it is restricted to an independent investigator. Anonymous written concerns may be sent to the registered office. If an internal route is unsuitable, consider the independent advice and external reporting information in Appendix II.

6. Responsibility and Accountability Framework

The directors are responsible for promoting ethical behaviour, transparency and accountability within Rapid Temps Ltd, and encouraging individuals to raise concerns. Their responsibilities include:

- Communicating clear standards on fraud, bribery, tax evasion, money laundering and other unlawful conduct;
- Providing appropriate training and guidance, and accessible arrangements for reporting concerns about wrongdoing;
- Putting in place preventive measures proportionate to the Company's activities and exposure to risk; and
- Allocating appropriate resources for effective investigation, corrective action and compliance.

Line managers are responsible for:

- Ensuring that their teams know about this policy and understand how to raise concerns through the available channels;
- Ensuring that reports are promptly referred and handled in accordance with the procedures in this policy and its appendices; and
- Respecting confidentiality and ensuring that whistle-blowers do not suffer retaliation for raising a concern.

Recipients of reports and those charged with investigating them are responsible for:

- Acting promptly to investigate concerns thoroughly while taking appropriate steps to protect the whistle-blower's confidentiality;
- Assessing information objectively and reporting findings and recommendations to an uninvolved decision-maker clearly and promptly; and
- Reviewing this policy and supporting procedures when required by legal, regulatory or contractual changes, and at least annually.

All employees and other persons covered by Section 2 are responsible for:

- Reading this policy and seeking clarification where needed;
- Cooperating with a fair investigation and respecting appropriate confidentiality; and
- Raising concerns honestly, identifying the facts known to them and using an appropriate reporting route.

7. Practical Implementation of This Policy

Questions about the operation of this policy may be raised with a director through info@rapidtemps.co.uk. Independent advice is also available from the contacts in Appendix II.

Additional written guidance may be issued when circumstances arise that are not specifically addressed in this policy. The directors will oversee such guidance and ensure that it is consistent with applicable law. No interpretation of this policy may restrict a person's right to make a protected disclosure.

Further information and relevant contact details are provided in Appendix II.

8. Policy Review

The directors will review this policy at least annually and whenever a material legal or operational change requires it. Any changes will be communicated to those affected. The document date for this version is November 2026.

Reporting Concerns - Process in Rapid Temps Ltd

Procedures for Making a Disclosure

A member of staff who receives a concern about malpractice must record the information accurately and refer it promptly to an appropriate investigating officer. Information should be shared only as needed to assess and investigate the concern, as follows:

• A concern will normally be referred to a director unless that director is involved in the matter or has a conflict of interest. In such cases, an uninvolved director or an appropriately independent investigator should handle it.

• Where a concern relates to a director's area of responsibility, an uninvolved director may appoint a suitable manager or independent external person to investigate, having regard to independence and relevant experience.

• A concern about a director may be raised with an uninvolved director, if available, or through an appropriate external reporting route. Independent advice is available from Protect.

• An investigating officer may be supported by another suitable person. Anyone involved in the allegation or with a conflict of interest must not determine the outcome.

The person raising a concern may bypass line management and contact an uninvolved director directly. A director may arrange for another suitable person to investigate where that person can act independently and fairly. Request a private contact arrangement before sending sensitive information to the general mailbox.

Where no internal route is suitable, the person may seek independent advice and consider a disclosure to an appropriate prescribed person or other legally protected recipient.

Where criminal activity is suspected, the investigator should consider referral to the police. Internal enquiries must not obstruct a police or regulatory investigation.

Timescales

Investigations differ in complexity and may involve independent investigators, regulators or the police. A fixed completion date cannot be promised in every case. The investigating officer should proceed as quickly as reasonably possible without compromising the quality and fairness of the investigation.

Where contact is possible, the investigating officer should acknowledge the concern promptly in writing and explain the proposed next steps. The person raising the concern should receive appropriate progress updates, particularly where an investigation is prolonged, and be told when a further update is expected. Outcomes will be shared as far as confidentiality and legal obligations permit.

Appendix I - Reporting Concerns

Written responses should be sent through a contact method agreed with the person raising the concern and handled confidentially, rather than automatically sent to a home address.

Investigating Procedure

The investigating officer should follow these steps:

1) Obtain the available details, relevant records and any necessary clarification of the concern.

2) Inform the person against whom an allegation is made at an appropriate stage, taking account of evidence preservation, confidentiality and legal obligations. Explain the allegation fairly and allow an opportunity to respond. Explain any applicable right to be accompanied at a formal interview or hearing.

3) Investigate the allegation thoroughly and objectively, obtaining assistance from other suitable individuals or bodies where appropriate.

4) Make a reasoned assessment of the information and record the findings, supporting evidence and recommendations in a written report. Submit the report to an uninvolved director or another appropriate independent decision-maker. Distinguish established facts from unresolved issues.

5) The uninvolved decision-maker will decide what action is appropriate. Where an allegation is substantiated, the relevant corrective or disciplinary procedure may be followed.

6) Consider whether a referral to the police, a regulator or another relevant authority is appropriate. Take advice where necessary and comply with any legal reporting obligation.

7) Keep the person raising the concern informed of progress and, where appropriate, the outcome, subject to confidentiality and legal requirements.

8) Use relevant findings to review and improve Company procedures and prevent recurrence.

If the person believes the matter has not been handled properly, they may request review by an uninvolved director or an appropriately independent person. Where this is not possible or suitable, independent advice and external reporting routes remain available.

Rapid Temps Ltd recognises the rights of workers and former workers to make protected disclosures to appropriate recipients. A person does not have to exhaust the internal procedure before seeking legal advice or making a disclosure that meets the applicable statutory requirements.

Untrue Allegations

A person will not be penalised merely because a concern based on a reasonable belief is not substantiated. Information should be presented accurately, with assumptions distinguished from known facts. Deliberately false information or fabricated evidence may result in disciplinary action, subject to a fair process and applicable statutory protections.

Appendix II - Further Information and Contact Details

Sources of Advice and Further Information

Rapid Temps Ltd Main contact and policy enquiries	info@rapidtemps.co.uk Company number: NI740786
Registered office Rapid Temps Ltd	28 Woodside Road Industrial Estate, Woodside Road, Ballymena, Northern Ireland, BT42 4QJ
Protect Independent whistle-blowing charity Free confidential advice	020 3117 2520 whistle@protect-advice.org.uk https://protect-advice.org.uk

Internal Reporting Contact

Rapid Temps Ltd Practising address: Greenvale Street	info@rapidtemps.co.uk Request private contact before sending sensitive information.

Escalation and Independent Advice

Director - Rapid Temps Ltd Use an uninvolved decision-maker	info@rapidtemps.co.uk If unsuitable, seek independent advice.
Labour Relations Agency Workplace Information Service	03300 555 300 https://www.lra.org.uk

The Company mailbox is a general contact address. Access is not represented as being limited to an independent investigator. Protect and the Labour Relations Agency provide independent advice; they do not operate a Rapid Temps reporting hotline.

External Reporting and Northern Ireland Guidance

A concern may be reported to the appropriate prescribed person or another recipient where the legal conditions for a protected disclosure are met. Check the recipient's current remit and obtain independent advice if unsure. Company approval is not required.

Department for the Economy - Public Interest Disclosure guidance:

www.economy-ni.gov.uk/publications/public-interest-disclosure-guidance

In an emergency or where there is an immediate danger to life, contact the emergency services on 999. The policy contact routes are not emergency response services.

Policy Owner: Directors of Rapid Temps Ltd

Version	Date	Description	Changes	Author
1.0	Nov 2026	Signed off by Director	Initial Rapid Temps edition	RT Ltd

Review Date: November 2027