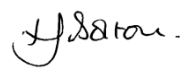


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Introduction

Whistleblowing is defined as:

The disclosure by an employee or other agent of confidential information, which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace, be it of the employer or of a fellow employee(s).

A whistle blower is not a "sneak" or a "trouble-maker" but someone who comes to a decision to express a concern after a great deal of thought. The law only requires that there be a genuine doubt – the individual is not expected to produce unquestionable evidence to support the concern.

The Company constantly strives to safeguard and act in the interest of the public and its employees. It is important to the Company that any fraud, misconduct or wrongdoing, by employees or other agents, is reported and properly addressed.

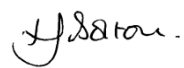
Applicability

This policy applies to all employees and all other stakeholders of the Company, who are encouraged to raise concerns in a responsible manner. The Company prefers that a concern is raised and dealt with properly, rather than kept quiet.

Your responsibilities

You are encouraged to bring to the attention of the Company any practice or action of the Company, its employees or other agents that you reasonably believe is against the public interest, in that the practice or action is;

- a criminal offence
- a failure to comply with any legal obligation
- a miscarriage of justice
- a danger to the health and safety of any individual
- an attempt to conceal information on any of the above
- gross misconduct
- mistreatment
- damaging to the reputation of the company
- contrary to labour standards
- contrary to regulatory requirements

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Any individual raising legitimate concerns in good faith will not be subject to any detriment, either during or after employment. The Company will also endeavour to ensure that the individual is protected from any intimidation or harassment by any other parties.

Procedure

In the first instance, if you are an employee of the Company, you should raise any concerns you have with your manager. If you believe your manager to be involved, or if, for any reason, you do not wish to approach your manager, then you should raise it with a more senior person in the Company.

If you are a supplier, customer, end user, or a stakeholder of the Company, you should raise any concerns you have with our Alerts Team who will facilitate direct contact with a senior member of our Management Team. Contact details can be found at the end of this policy.

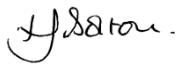
Any matter raised under this policy will be investigated promptly and confidentially. The outcome of the investigation, as well as any necessary remedial action to be taken, will be confirmed to you. If no action is to be taken, the reason for this will be explained to you.

Escalating your concern

If you are dissatisfied with this response, you should raise your concerns in writing directly with the Managing Director. Contact details can be found at the end of this Policy.

If, after escalating your concerns, you believe that the appropriate remedial action has not been taken, you have the right to report the matter to the appropriate authority. These authorities include:

- HM Revenue & Customs
- the Financial Services Authority
- the Health and Safety Executive
- the Medicines and Healthcare products Regulatory Agency
- the Environment Agency or Scottish Environmental Protection Agency
- the Information Commissioner
- Citizens Advice Bureau

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This list is not intended to be exhaustive, and you must take care to ensure you contact the proper authority in relation to the particular concerns you have. Contact details for these authorities can be found at the end of this policy.

If you raise a concern and you are found to be culpable, or in any way involved in the wrongdoing, or if you raise a concern maliciously or in a manner not prescribed in this policy, then you may be subject to disciplinary action up to and including dismissal without notice for gross misconduct.

You should not disclose to a non-relevant third party any details of any concern raised in accordance with this policy, and you must not, in any circumstances, publicise or disseminate any details related to your concerns in any way, or by any means.

Direct contact details for external stakeholders:

alerts@boltons.co.uk

Tel: 00 +44 (0) 114 240 4400

Contact details for authorities:

HM Revenue & Customs (HMRC) – visit their website www.hmrc.gov.uk

Financial Conduct Authority (FCA) – visit their website www.fca.org.uk

Health and Safety Executive (HSE) – visit their website www.hse.gov.uk

Medicines and Healthcare products Regulatory Agency (MHRA) – visit their website <https://www.gov.uk/government/organisations/medicines-and-healthcare-products-regulatory-agency>

Environment Agency or Scottish Environmental Protection Agency – visit their website www.gov.uk/government/organisations/environment-agency or www.sepa.org.uk

Information Commissioner (ICO) – visit their website www.ico.org.uk

Citizens Advice Bureau (CAB) – visit their website www.citizensadvice.org.uk

Bolton Surgical Limited

Churchill House
16 Churchill Way
Chapeltown
Sheffield S35 2PY
United Kingdom

T. +44 (0)114 240 4400
F. +44 (0)114 257 6555
E. sales@boltons.co.uk
www.boltons.co.uk

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