Whistleblowing Policy

DISTRIBUTION

This Whistleblowing Policy is communicated to all employees. A copy is available at the Head Office, held in the sites folder, and published on the internal company shared drive. All employees are encouraged to read it and communicate any queries to a Director.

Issue Number	Review Date	Changes	Signed
01	22/09/2023	Original version (draft)	
01	22/09/2023	Signed off	
01	20/09/2024	Review	
01	19/09/2025	Review	
02	20/05/2026	Address Updated	
02	18/09/2026	Review	

Purpose
ZAM FM LTD is committed to maintaining a culture of openness, accountability, and integrity. This policy aims to provide employees and other stakeholders with a clear process for reporting concerns about malpractice, misconduct, or wrongdoing within the organisation. It ensures that whistleblowers are protected in line with the Public Interest Disclosure Act 1998 (PIDA).

Scope
This policy applies to all employees, contractors, consultants, and any other individuals working with or on behalf of ZAM FM LTD. It covers concerns related to:

- Criminal activity
- Breach of legal obligations
- Miscarriages of justice
- Health and safety risks
- Environmental damage
- Fraud, bribery, or corruption
- Concealment of any of the above

Reporting Procedure
Concerns should be raised as soon as possible through one of the following channels:

- **Line Manager**: Employees should first report concerns to their immediate supervisor.

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- **Whistleblowing Officer**: If the employee feels unable to speak to their line manager, they should contact the designated Whistleblowing Officer at [contact details].
- **Senior Management/Board of Directors**: If the concern remains unresolved, it can be escalated to senior management or the Board.
- **External Reporting**: If internal reporting does not resolve the issue, whistleblowers may report concerns to external bodies such as regulators (e.g., the Financial Conduct Authority, Health and Safety Executive) or law enforcement agencies.

Confidentiality and Protection

- All disclosures will be treated in strict confidence, and the identity of the whistleblower will be protected unless legally required to disclose it.
- ZAM FM LTD prohibits retaliation against whistleblowers. Anyone found victimising a whistleblower will face disciplinary action.
- Whistleblowers who report concerns in good faith will be protected, even if their concerns turn out to be unfounded.

Investigation Process

- Upon receiving a disclosure, the organisation will acknowledge receipt and assess the concern.
- An appropriate investigation will be conducted by an appointed officer.
- The whistleblower will be informed of the progress and outcome of the investigation where possible.
- If misconduct is confirmed, appropriate corrective actions will be taken.

False or Malicious Allegations

Employees who deliberately make false or malicious allegations may be subject to disciplinary action.

Review and Monitoring

This policy will be reviewed annually to ensure effectiveness and compliance with legal requirements.

Managing Director

Name: Danish Iftikhar

Sign: 

Dated: 22/09/2023