



**HTSPE**

International Programme Management

## **Whistleblowing Policy**

The Board of HTSPE are committed to an ethos of transparency throughout the business and all of its international programmes as reflected by the company's Code of Ethics and Professional Code. As part of this philosophy the company has a whistleblowing policy in order to assist anyone who may have any concerns in relation to how the company is run, how it manages its work and the work and behaviour of anyone linked to HTSPE in any way.

Whistleblowing is defined as:

*Raising concerns about misconduct within an organisation or within an independent structure associated with it*

(Nolan Committee on Standards in Public Life)

The Company wishes to ensure that ethical standards are maintained in all aspects of its work. Therefore if anyone becomes aware of behaviour which could constitute:

- A criminal offence;
- A failure to comply with a legal obligation;
- A miscarriage of justice;
- The endangering of an individual's health and safety;
- Damage to the environment; or
- Deliberate concealment of information relating to any of the above

They should report it immediately to the Director of Human Resources by sending an email to [transparency@htspe.com](mailto:transparency@htspe.com). The behaviour in question does not have to relate to an employee of the company but could for example relate to the conduct of a contractor.

Such behaviour is deemed unacceptable by the Company and will lead to action being taken under the Company's disciplinary procedure.

Anyone raising concerns under this policy will be entitled to have the issue raised treated in confidence if they so wish.

Christopher Lockett  
Managing Director

27<sup>th</sup> June 2011