



Whistleblowing Policy and procedure

This procedure applies to all employees, former employees and contract workers working with Surgitrac Instruments or its subsidiaries ('Workers').

The purpose of this procedure is to provide a framework to promote responsible whistleblowing.

Whistleblowing is the reporting by Workers of any malpractice or illegal act or omission by other Workers.

1.0 relationship of this procedure to surgitrac instruments' other policies and procedures

Surgitrac Instruments' policies and procedures on grievance, discipline, harassment etc should be used in most situations. The use of this procedure should be restricted to where you reasonably believe one of the following has occurred, is occurring or is likely to occur:

- a criminal offence, including fraud;
- disregard for legislation, particularly in relation to health and safety at work;
- malpractice, or ill treatment of a customer or supplier by a member of staff;
- serious damage to the environment;
- any other serious irregularity; or
- deliberate concealment of any of the above.

Whistle-blowing should not be used in place of Surgitrac Instruments' grievance procedures or be a route for raising malicious or unfounded allegations. Only those who use this policy in good faith will be protected under it (see below).

2.0 The procedure

2.1 The Designated Officer

The following person is the Designated Officers under this procedure, this is Chairman of Surgitrac Instruments:-

Andrew Lawson, Chairman and Non- Executive Director, Email whistleblowing@surgitrac.com



Only the designated officer has access to the email address specified above.

2.2 Raising a concern – the line manager route

You should normally raise concerns about wrongdoing and malpractice with your immediate manager first, who will notify the matter to one of the Designated Officers.

2.3 Raising a concern – the Head Office route

If you consider it more appropriate or easier to raise your concern, in the first instance, with a director of Surgitrac Instruments other than the designated officers, then please do so and he or she will notify one of the designated officer.

Raising a concern – the designated officer route

If the matter is of a very serious nature, such as an allegation of fraud involving a Surgitrac Instruments director, or if it involves your immediate manager, you may notify the designated officers direct. You must include the words 'Whistle-blowing' in the subject heading of the email or letter you send.

3.0 The investigation stages

3.1 Interview

The Designated Officer will, if requested, arrange an initial interview.

At this stage, you will be asked whether you wish your identity to be disclosed. (You may not make anonymous complaints to the Designated Officer, but your identity may remain confidential to the Designated Officer as far as reasonably practicable.)

You will also be asked whether or not you wish to make a written or oral statement. In either case the Designated Officer will write a brief summary of the interview, which will be agreed by both parties.

The Designated Officer will report to the Directors of Surgitrac Instruments and will together decide on what further investigation, if any, should take place. They will report back to you within 10 working days of your interview or receipt of your complaint, whichever is the later.

3.2 The investigation

It may be necessary that certain investigations will be carried out in strict confidence (with the employee under investigation not being informed until necessary). In certain other circumstances



the employee may have to be suspended pending the investigation. If the investigation shows there is a case to answer, the Company's Disciplinary Procedure will be invoked against the employee concerned.

If there is found to be no case to answer, the Designated Officer will ensure that you are protected, provided the disclosure was made in good faith. Only where you are found to have made false allegations maliciously will the Disciplinary Procedure be invoked against you.

3.3 Inquiries

If the concern raised is very serious or complex, an inquiry may be held.

Following the investigation

The Directors or Chairman will arrange a meeting with you to give feedback on the investigation. (This will not include details of any disciplinary action, which will remain confidential to the individual concerned.) The feedback will be provided within 10 working days of the conclusion of the investigation and any inquiry.

4.0 Appeals process

If you are not satisfied with the outcome of the investigation, Surgitrac Instruments' recognises your right to make disclosures to prescribed regulators or, where justified, elsewhere.

4.1 The law

This procedure is meant to complement any local legislation which protects Workers making good faith disclosures about certain matters of concern.

4.2 Protection of whistle-blowers

Surgitrac Instruments will not tolerate any harassment, victimisation or discrimination of a good faith whistle-blower and will treat this as a serious disciplinary offence. The whistle blower's rights against retaliation under any applicable legislation are fully recognised by Surgitrac Instruments.