



Whistleblowing Policy (Disclosures in the Public Interest)

As a public limited company, we must meet certain standards. One of those requirements is that we have in place a process for any member of staff, or a worker providing services to the company, to raise a genuine concern about serious malpractice within the company.

This is sometimes referred to as a Whistleblowing Policy or a Procedure for Disclosures in the Public Interest. A summary of the policy is given below. The Employee Handbook contains additional details or you can ask for a fuller explanation from the Human Resources team at Head Office.

What is serious malpractice?

Examples are:

- Fraud or financial irregularity
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Endangering the health or safety of any individual
- Endangering the environment

With whom do I raise a significant concern?

Normally, such matters should be raised with a Director as soon as practicable. There are two exceptions where the matter can be raised at a higher level:

- i) If a Director is thought to be implicated in the malpractice, your concern should be raised with the Chief Executive.
- ii) If either the Chief Executive or the Finance Director are thought to be implicated, you should raise the matter with one of the Independent Non-executive Directors or Chairman (contact details are given at the end).

What will happen?

Significant concerns should be disclosed in confidence to a Director of the company (or as above), giving the grounds for the belief of malpractice together with as much supporting evidence as possible. This should, wherever possible, be in writing but if this is not practicable a verbal account should be given.

The Director will wish to interview you, in confidence, as soon as practicable. An investigation will take place. The Director will let you know whether or not further steps will be taken regarding the matter. If you wish to be accompanied to the interview, a colleague employed by the o2o group or a representative of a recognised trade union may accompany you.

As far as practicable, the name of the discloser will not be revealed in the investigation.

As it is in the public interest for such disclosures to be made, disciplinary action will not be taken against you, as the discloser, provided the disclosure was made in good faith, as it is better for such matters to be raised rather than ignored. You will not be subjected to any form of detriment for raising a significant concern in this way.

However, if the disclosure was not made in good faith, for example, it was made maliciously or for personal motives, disciplinary action will be taken. Similarly, if the disclosure was made in breach of this procedure, disciplinary action will be taken.



What other steps can I take if I am not satisfied with the outcome?

If you have followed this procedure in full but are not satisfied with any further steps decided upon or the outcome of such steps, you may raise the matter directly with a relevant external body such as the Police, a Member of Parliament or the appropriate public authority.

Before referring the matter to an external body, you must inform the Director of your intention.

Other circumstances in which an External Disclosure may be permissible can be obtained from the Human Resources team.

Legal protection is given to individuals who decide, in good faith, to refer the matter to an outside body provided the procedures above have been followed and the disclosure has been made in good faith.

How do I make contact with the Directors/Chairman?

You can write to or e-mail the Directors as below. All correspondence should be addressed to the relevant director at o2o plc, St Crispins, Duke Street, Norwich, Norfolk NR3 1PD

The directors can be contacted via e-mail either on the company e-mail system or via the Internet – using the address format shown below.

The Chief Executive, Chairman or Independent Non-executive Directors can be contacted by e-mail as below

Simon Moate, Chief Executive	e-mail	simon.moate@office2office.biz
David Callear, Chairman	e-mail	david.callear@office2office.biz
Jim Cohen, Senior Independent Non-executive Director	e-mail	jim.cohen@office2office.biz

Posted on the internet by the Human Resources Director
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