

6.4 The Care Trust Policy on Whistleblowing

Policy Statement

This Whistleblowing Policy is designed to:

- support the values of The Care Trust DAC (“TCT” or “the Company”);
- In alignment with its Mission Statement, TCT has a set of core values which are: *Integrity and honesty; Accountability and Transparency.*
- ensure employees can raise concerns without fear of suffering retribution; and
- provide a transparent and confidential process for dealing with concerns.

This Policy not only covers possible improprieties in matters of financial reporting, but also fraud; corruption, bribery or blackmail; criminal offences; failure to comply with a legal or regulatory obligation; miscarriage of justice; endangering the health and safety of an individual; and concealment of any of the above.

Principles

- All concerns raised will be treated fairly and properly.
- TCT will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- Any individual making a disclosure will retain their anonymity, unless they agree otherwise, insofar as is practical within the limits of strict confidence.
- TCT will ensure that any individual raising a concern is aware of who is handling the matter.
- TCT will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern in good faith. This assurance is not extended to someone who maliciously raises a matter they know to be untrue.

Procedure

Where an employee has a grievance, it may initially be resolved by referring to another Policy (such as Health & Safety) or to the Grievance Procedure in the Staff Handbook. In relation to a bullying or harassment issue, the Grievance Procedures in the Staff Handbook include a formal and an informal procedure for addressing complaints.

Where the matter concerning the employee cannot be resolved in this way, he or she should report their concerns directly to either the:

- a member of the Senior Management Team; or
- the Chief Executive.

If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they should contact a Member of the Audit Committee.

Members of the Audit Committee can be contacted at the following email address:

Name	Confidential Email Address
Noreen O'Kelly	OKellynom@gmail.com
Bernard Walsh	bwalsh@boi-ii.com
Tom Fleming	Tom.Fleming@vwgi.ie

Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact and if there is any further employee support service available, either internally and/or externally. TCT will give as much feedback as possible without infringing on a duty of confidence owed by it to someone else.

Confidentiality

All information received under this Policy will be treated confidentially to the extent possible. Personal or confidential data provided will be treated in line with legal data protection obligations and TCT's Data Protection Policy.

False Reporting

There may be instances where an employee discloses an issue which is subsequently found to be without foundation or inaccurate. If TCT is satisfied that the employee acted in good faith and had reasonable grounds for disclosing the issue, no action will be taken against the employee.

However, employees knowingly and deliberately disclosing a concern that is unfounded, or for which there is no reasonable grounds for believing to be genuine, may be subject to TCT's Disciplinary Procedure.

Legal protection for disclosures

Employees in Ireland are protected by law when making defined disclosures. The Protected Disclosures Act of 2014 and the Criminal Justice Act of 2011 afford protection for employees making disclosures.