

Whistleblowing Policy (UK Appendix)



1. ABOUT THIS POLICY

1.1 This appendix should be read in conjunction with the Demant Whistleblowing Policy and details local UK variations and contacts.

1.2 As part of the Demant Group, Hidden Hearing is committed to conducting our business with honesty and integrity and we expect our employees to help us to maintain high standards.

1.3 The aims of this appendix are:

- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide staff with guidance as to how to raise concerns.
- (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. PERSONNEL RESPONSIBLE FOR THE POLICY

2.1 The Demant Group, Legal and Compliance Team has overall responsibility for this policy. The board at Hidden hearing has overall responsibility for the UK Appendix and for reviewing the effectiveness of actions taken in response to concerns raised under it.

2.2 The designated Whistleblowing Officers have day-to-day operational responsibility. (Contact details for Hidden Hearing's Whistleblowing Officers can be found at the end of this appendix).

2.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In this instance, you should use the Grievance Procedure (HHHR008).

2.4 If you are uncertain whether something is within the scope of this policy you should seek advice from you line manager or one of the designated Whistleblowing Officers, whose contact details are at the end of this appendix.

3. RAISING A WHISTLEBLOWING CONCERN

3.1 Concern may be raised through local channels, e.g. your line manager, HR, or one of the designated Whistleblowing Officers.

You can also raise your concern to the Group Legal & Compliance Team or by using the Whistleblower hotline.

All concerns no matter how raised will be logged in the global Whistleblower system, to ensure that our global process is governed according to the Group Management Protocol.

Demant Whistleblower hotline – File a report online through the hotline on www.demant.com, via KiteNet/Inside or directly via an app on your mobile device.

The system guarantees confidentiality and anonymity.

There will be no discriminatory or retaliatory actions against employees who file a complaint with or raise concern to the company in good faith.

4. DATA PROTECTION

When an individual makes a disclosure, Hidden Hearing will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

5. EXTERNAL DISCLOSURES

5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

5.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

5.3 Whistleblowing concerns may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the designated Whistleblowing Officers for guidance.

6. CONTACTS

Designated Whistleblowing Officer (for concerns under Health & Care Professions Council (HCPC) Code of Practice Clause 2)

Hugh Crawford

Hearing Aid Dispenser (HCPC Partner)

Mob: 07971 133498

Email: hucr@hiddenhearing.co.uk

Designated Whistleblowing Officer (for all other non HCPC matters)

David Rist

Head of Training & Development

Mob: 07968 570888

Email: dri@hiddenhearing.co.uk

Managing Director

Graham Lane

Mob: 07968 570840

Email: gla@hiddenhearing.co.uk

To raise a concern via the Demant Global Whistleblowing Hotline – it's completely confidential:

<https://demant.codeofconduct.app/app-page;appPageName=Raise%20Concern>

Confidential Counselling Hotline

Lifeworks

The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ

Tel: 0800 169 1920

Public Concern at Work (Independent whistleblowing charity)

Helpline: (020) 7404 6609

E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk



Hidden Hearing

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