

VWA Sensitive Issues Policy

The following is a policy statement of our role in the implementation of Sensitive Issues within our organisation and its place in SMETA audits and management.

It is seen as necessary and beneficial in that its aim is to make all permanent and temporary Employees and contractors of the Company and other individuals supplying services to it (including external consultants, contractors and agency personnel) whilst at the Company aware of Sensitive Issues and maintain continuity of language and content throughout the business.

The following topics may sometimes be considered sensitive:

- Sexual behaviours or practices.
- Illegal activities or ethically questionable behaviours.
- Racism, ageism, classism, discrimination, and sexism.
- Extreme political views
- Experiences of grief and loss, trauma, or violence.
- The experience of being part of any of the potentially vulnerable populations.
- Job performance or competency.
- Misuse of social media

Political views

Everyone is entitled to hold their own personal and private political views. It is not permissible to express them at the workplace thereby upsetting others for whom those views are unacceptable. For example anyone with extreme right-wing views which include extremist views on immigration and immigrants must keep those views strictly private.

It is also forbidden to go to internet sites or to download offensive images expressing racial hatred or homophobic or sexist views, etc.

Any kind of harassment, intimidatory or racist/sexist/homophobic, etc language or behaviour will not be tolerated and would constitute gross misconduct even for a single act for which summary dismissal could be one outcome.

Discussing such views in the workplace even with like-minded colleagues is strictly forbidden as such conversations can be hurtful and offensive and intimidating to others.

Please be very careful to keep your views about any politically extreme views to yourself and do not share them with other colleagues like-minded or not.

Social Media

Employees and contractors must make it clear when posting information or comments on a social networking site that any personal views which are expressed do not represent those of the company. The following wording (adapted as necessary) should be used: “Any views contained in this blog are those of [the employee] and are not representative of [the employer’s] views.”

Employees and contractors must not give out work email addresses or work telephone or other contact numbers — only personal contact details should be given out.

Employees and contractors must not post information on a social networking site which is confidential to the company, its suppliers or customers or which damages or which is likely to damage client relationships or the reputation of any member(s) of staff.

Employees and contractors must refrain from making reference on a social networking site to the company and/or its products and services, its Employees and contractors, its customers/clients and its suppliers.

Employees and contractors must not post entries on a social networking site which are derogatory, defamatory, discriminatory, unflattering, critical, negative or offensive in any way, or which could bring the company into disrepute.

Employees and contractors should be aware that blogs may create documents which the courts can order to be disclosed for use in litigation. Consequently, Employees and contractors will be assumed to have written any contentious items unless they can prove definitively that they have not done so.

Blogging or web logging is the sharing of opinions and thoughts through an on-line diary. Employees and contractors are not permitted to write or contribute to a blog where the content lowers the reputation of the company, its staff, customers or clients (or potential customers or clients) and/or which contravenes our Equal Opportunities Policy. This includes pages on websites such as Tik Tok, Instagram, Twitter, and/or Facebook.

Raising concerns

Company employees should contact their immediate manager, Head of Department or the relevant Director in good faith in order to raise their concerns. Other individuals supplying services to the Company should contact their nominated relationship manager within the Company. The matter will then be raised with the Company Director.

If the concern involves your immediate manager or Head of Department / Director or nominated relationship manager, or for any reason you would prefer them not to be told, you may raise the issue directly with the Company Director.

We encourage you to put your concerns in writing and include as much detail as possible.

You are encouraged not to disclose your concerns outside the Company unless you have first given the Company the chance to deal with the problem in accordance with this policy. Should you choose to raise your concerns externally rather than notifying the Company in the first instance, certain protection which you may have in law could be compromised or lost.

Next steps

The Company Director will be responsible for ensuring that a full investigation takes place with the objective of establishing whether sensitive issue has occurred. In relevant circumstances, the Company Director may delegate tasks and responsibilities to specific independent Company managers and/or the Human Resources team to assist in conducting the investigation.

As part of the investigatory process, it may be necessary for the Company Director (or those individuals nominated by the Company Director to assist in the conduct of the investigation) to meet with you. The purpose of any such meeting will be to obtain further details of your concern and gain a better understanding of the relevant background facts supporting your concern.

You may be accompanied at any such investigatory (fact finding) meeting(s) by a fellow employee of your choice who may be a colleague. (This does not extend to accompaniment by a legal representative). You may confer with your companion during the course of the meeting and he/she may address the meeting but may not answer questions on your behalf.

Individual(s) who are subject to investigation as a result of the concerns you have raised may also be accompanied by a Company member of staff (or as otherwise permitted by law) to any investigatory meeting which they are asked to attend.

All information and evidence gathered during the investigatory process will be taken into account. The format of the investigation may vary depending upon the circumstance. In extreme circumstances, the Company's internal investigations may need to be suspended if its investigations could jeopardise any police, governmental or regulatory investigations in to similar or connected concerns.

The Company will seek to ensure that the findings of the investigation will be communicated to:

- a) you as the person raising the sensitive issue concern;
- b) the individual(s) under investigation (as appropriate);
- c) relevant members of management within the Company and (if appropriate) Hitachi Ltd to consider what further action may be necessary based on the investigation's findings;
- d) external authorities, (if the further involvement is likely to be required due to the nature of the sensitive issue concern and the findings reached).

Grievance Procedure

The Grievance Procedure also exists for the Company's employees to raise concerns about their own working conditions. The Grievance Procedure should generally be used if you are an employee and your concerns do not relate to actual or suspected sensitive issue of the nature outlined above.