

Whistleblowing Policy

Strategic Data Consultancy Ltd

Document Ref: SDC-POL-WB-001

Version: 1.0 – Initial Version

Date: 15 April 2026

Review Date: 14 April 2027

1. Purpose

This policy sets out Strategic Data Consultancy Ltd's (SDC) approach to whistleblowing and provides a clear process for reporting concerns relating to serious wrongdoing.

SDC is committed to maintaining high standards of integrity, transparency, and accountability, and encourages individuals to raise concerns where they believe wrongdoing has occurred.

2. Scope

This policy applies to all individuals working with or on behalf of SDC, including but not limited to:

- Employees
 - Subcontractors
 - Consultants and associates
 - Suppliers where relevant
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3. Reporting a Concern

Concerns should be raised as soon as possible.

Reports can be made:

- Directly to the Director (John Sutherns)
- By email to: info@strategicdata.uk
- By telephone or in person where appropriate

Where a concern relates to the Director, the matter may be raised with an appropriate external authority, including the Police, HMRC, or a relevant regulatory body.

4. Confidentiality and Protection

All concerns will be treated confidentially so far as reasonably practicable.

Individuals raising concerns in good faith will not suffer any form of detriment, disadvantage, or retaliation as a result of doing so.

5. Investigation Process

All reports will be:

- Acknowledged promptly
- Assessed and investigated where appropriate
- Managed proportionately based on the nature of the concern

Investigations will aim to be completed within a reasonable timeframe. Where this is not possible, updates will be provided.

Appropriate action will be taken based on findings, which may include corrective action or escalation where necessary.

6. Related Policies

This policy should be read alongside:

- Anti-Bribery Policy (SDC-POL-ABC-001)
 - Modern Slavery Policy (SDC-POL-MOD-001)
 - Health & Safety Policy (SDC-POL-HS-001)
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7. Responsibility

Given the size and structure of the business, overall responsibility for this policy sits with:

John Sutherns – Director


8. Monitoring and Review

This policy will be reviewed annually or in response to:

- Changes in legislation
 - Changes in business operations
 - Identified concerns or incidents
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9. Commitment

Strategic Data Consultancy Ltd is committed to maintaining an open and transparent working environment where concerns can be raised without fear of retaliation.



Signed:
John Sutherns
Director