

Serious Incident Policy and Procedure

Purpose

The purpose of this policy is to provide ERP Ltd staff and other stakeholders with the opportunity and confidence to raise concerns internally, and to enable ERP Ltd to take appropriate actions to prevent any serious incident from reoccurring. ERP Ltd expects that in most cases, raising concerns internally in accordance with this policy will be the most suitable course of action.

This policy applies to all ERP Ltd staff and any other individual or organisation that has a relationship with ERP Ltd.

Policy

Introduction

ERP Ltd is a growing company, and as such, significant incidents or events may occasionally arise that could negatively affect the company (Serious Incidents). ERP Ltd takes malpractice or any issues that could affect its status very seriously. Through this policy, ERP Ltd encourages open communication with its employees and stakeholders regarding any concerns.

This policy aims to provide guidance on how to report a Serious Incident or matter. Employees and stakeholders of ERP Ltd should read this policy in conjunction with ERP Ltd's **Whistleblowing Policy**, which provides employees with protection from retaliation as a result of making a "qualifying disclosure" (as defined in that policy).

This policy is distinct from ERP Ltd's grievance and complaints procedures. If you have a personal complaint related to your employment, you should consult the **Grievance Policy**.

Reporting Requirements

A **reportable event** is any event or situation that materially affects or could affect ERP Ltd's legal structure, business model, or its ability to meet its operational or regulatory obligations. As a result, this policy encourages employees and third parties to report any Serious Incident to ERP Ltd to protect its funds, reputation, and regulatory standing.

Scope

This policy applies to all employees of ERP Ltd and any individual or organization that has a relationship with ERP Ltd.

Procedure for Reporting an Incident

1. **Report Submission:** As soon as reasonably possible, details of any Serious Incident should be submitted in writing to the **Operations Director**. If the Operations Director is the subject of the report or is involved in the incident, the report should be submitted to the **HR Manager**.
2. **Information to Include:**
 - The nature of the incident or circumstances
 - The impact or potential impact on ERP Ltd
 - The date of the incident or suspected occurrence
 - The names of any individuals involved or suspected of being involved
 - Whether the incident has been reported to any other individual or regulatory body prior to submitting the report to ERP Ltd, the police, or a professional body
 - Details of any ongoing investigations or actions taken to date
 - Whether any relevant ERP Ltd policies (e.g., **Whistleblowing Policy, Health and Safety, or Environmental Policy**) have been consulted

The individual receiving the report will decide whether the incident qualifies as a **Serious Incident** under this policy.

Anonymity and Confidentiality

ERP Ltd takes confidentiality seriously and will, if requested, keep the identity of an individual reporting a Serious Incident under this policy confidential. Individuals may report incidents anonymously, although this may limit ERP Ltd's ability to investigate the matter as effectively as with an open report.

Investigation Process

Upon receipt of the report of a Serious Incident, the **Operations Director** will, if deemed necessary, offer to meet confidentially with the individual who submitted the report to gather further details about the incident.

Following the meeting, the **Operations Director** will determine if the incident qualifies as a **Serious Incident** under this policy. If it does, an **Investigating Manager** will be appointed to oversee the investigation.

The following process will be followed:

- The investigation will be conducted as swiftly and sensitively as possible.

- The **Investigating Manager** will provide their findings, along with appropriate recommendations, to the **Operations Director** within 28 days of being appointed, although this may vary depending on the complexity and scope of the matter.
- The person who reported the incident will be informed whether:
 - The incident is considered a Reportable Event
 - Further internal action will be taken

A written record will be kept throughout the investigation, and confidentiality will be maintained to ensure a fair process. Any reprisals against or victimization of the person reporting the incident will be treated as a serious disciplinary matter, potentially leading to dismissal.

Monitoring of Reportable Incidents

A record of all incidents deemed to be **Reportable Events** will be maintained by the **HR Manager**. The record will be periodically reviewed to identify any patterns of Serious Incidents that may need to be addressed by ERP Ltd.

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