

### WHISTLEBLOWING POLICY

## About this policy

We are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities which may be in the public's interest. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### How to raise a concern

If you witness or experience dishonest or unethical behaviour, your first port of call should ordinarily be to report your concern to your line manager or a member of the HR team. They will arrange a meeting with you as soon as possible to discuss your concern, and if you wish, you may bring a colleague or union representative to any meetings under this policy, provided they respect the confidentiality of your disclosure and any subsequent investigation.

However, in the event that you do not feel able to raise your concern with your line manager or a member of the HR team, we have a service provided by Safecall which offers a professional, independent, external and confidential means for you to report serious concerns.

You can call Safecall on **0800 915 1571** at any time, or alternatively you can make contact via the web *www.safecall.co.uk/report*. All calls and reports are treated with utmost confidentiality by independent advisors who will, should you wish for whatever reason, not disclose your name to anyone at Team17. Please note that Safecall is an additional service and does not replace other company policies and procedures already in place.



# Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

## **External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as SafeCall or a regulator.

## Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform a member of the HR department immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.