

Whistleblowing Policy

Issue 1.3

PUBLIC

6point6

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1. Introduction

The Company seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organisation, we believe that we can help prevent such situations occurring. We expect all staff to maintain high standards and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of all staff to raise any concerns that they might have about malpractice within the workplace. The aim of this policy is to ensure that our workers are confident that they can raise any matters of genuine concern without fear of reprisals, even if they turn out to be mistaken, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

The following guidance sets out the procedure by which staff can report genuine concerns about workplace practices.

2. Purpose

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

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 from the People team before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the Company, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns to us first. You should contact the People team for guidance.

3. Scope

This policy applies to all applicants, employees and contingent workers of 6point6 who are employed by, or provide services to the Company, or whose regular base or place of employment is with the Company. It includes individuals working for us at all levels and grades, including but not limited to senior managers, directors, employees, contractors, trainees, apprentices, home workers, agency staff and volunteers.

The policy does not form part of the contract of employment and may be amended at any time.

The policy covers matters involving suspected wrongdoing or dangers at work both within the company and at other organisations we interact with (such as but not limited to customers, suppliers and service providers).

4. Responsibilities

3.1 Employees:

- You are expected to comply with this policy at all times.
- You will direct questions regarding this policy to the People team.
- You will report any breach of this policy to your Performance Manager, any other Manager or the People team.

3.2 Performance managers:

- You will ensure that you set a good example by your own behaviour.
- You will ensure that your employees know the standards of behaviour expected of them.
- You will promptly report any breach of this policy to the People team.

3.3 People team:

- You will advise and provide guidance to employees and Performance Managers regarding the application of this policy.
- You will ensure all potential investigations are dealt with promptly, fairly and consistently.
- You will ensure action is taken under the relevant country complaints/discipline policy where appropriate.

5. What is whistleblowing?

Whistleblowing is the disclosure of information which is made in the public interest and relates to suspected wrongdoing or dangers at work. You should use this policy if you have a genuine concern that there are reasonable grounds for believing that any of the examples below have taken place or are taking place within the Company or another organisation we interact with:

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Slavery, servitude and forced or compulsory labour
- Human trafficking

- Failure to comply with any legal or professional obligation or regulatory requirements
- Bribery (see Anti-Bribery & Corruption policy in Appendix 9)
- Financial fraud or mismanagement
- Negligence
- Breach of our internal policies and procedures
- Unauthorised disclosure of confidential information
- Unlawfully obtaining, disclosing or selling personal information without the consent of the company responsible for that information (in this case 6point6 or a third party); and/or
- The deliberate concealment of any of the above matters

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing you should report it under this policy. In the context of the Company's business, particular concerns which may fall within the terms of this policy include, for example, breach of confidentiality, financial fraud, harassment occurring to others and health and safety. In general, this policy covers actions or omissions you consider are illegal, are contrary to policy or established procedure or are outside the scope of an individual's authority and/or actions which could damage the Company's reputation.

6. Personnel responsible for implementation

The Leadership Team has overall responsibility for the Company's policy on whistleblowing but has delegated day-to-day responsibility for overseeing and implementing it to the designated whistleblowing officer (DWO) who is the CFO. Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the organisation resulting from investigations into complaints under the policy lies with the Leadership Team.

Managers have a specific responsibility to facilitate the operation of this policy and to ensure that workers feel able to raise genuine concerns without fear of reprisals in accordance with the procedure set down below.

All staff are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware. If you have any questions in relation to this policy, you should contact the People team.

7. What disclosures are covered?

This policy is distinct from our Grievance Procedure. If you have a complaint relating to your personal circumstances in the workplace then you should use the Grievance Procedure. Genuine concerns about malpractice within the organisation which falls within the categories set out above and which affects or could affect, for example, customers, service users, members of the public or other members of staff, should be raised using the procedure set out in this policy.

We take any concerns reported under this procedure seriously. If you are uncertain whether the matters concerning you are within the scope of this policy (for example, if you are suspicious but uncertain as to whether the law has been broken, or whether a person is acting outside the scope of their authority), we encourage you to report the concerns to the DWO in accordance with the procedure set out in this policy.

8. To whom should disclosure be made?

We recognise that you may not feel comfortable discussing concerns with your direct Performance Manager. For the purposes of this procedure you are asked, in the first instance, to raise genuine concerns about any form of malpractice with the DWO. Your concerns should be raised in writing.

If the disclosure is extremely serious or in any way involves the DWO, you should report it directly to the Chief People Officer (CPO). In any event, please contact the People team if you have any questions or queries about the procedure.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a work colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concerns as outlined to us at the meeting and will provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the DWO or to the People team and appropriate measures can then be taken to preserve confidentiality.

9. Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigators may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

10. If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you should raise it with the People team.

11. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the DWO immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure. Please note that any disclosure made in bad faith or maliciously will not be tolerated and could lead to disciplinary action.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

12. Monitoring and review of policy

The People team will be responsible for reviewing this policy.

The DWO has responsibility for ensuring that any personnel who may be involved with administration or investigations carried out under this policy receive regular and appropriate training to assist them with these duties.