SPIRITMEDIA.

Whistleblowing Policy

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1. Purpose

1.1 We want anyone who works with us to feel safe to speak up about wrongdoing, without fear for their job or their treatment. A small business has no room for problems that fester in silence, and the law protects those who raise genuine concerns. This policy explains what whistleblowing is, how to raise a concern, and how we will respond. It applies to all employees, and to freelancers, contractors and agency workers engaged by us.

2. What Whistleblowing Is

2.1 Whistleblowing is reporting information which you reasonably believe shows wrongdoing, and which it is in the public interest to disclose - a “qualifying disclosure” in law. It includes information tending to show any of the following, whether past, present or likely:

- a criminal offence - including fraud, bribery or corruption;
- breach of a legal obligation;
- a miscarriage of justice;
- danger to the health and safety of any person;
- damage to the environment;
- sexual harassment - which the law expressly recognises as a qualifying disclosure in its own right; or
- deliberate concealment of any of the above.

2.2 A personal grievance about your own employment - pay, workload, a dispute with a colleague - is normally a matter for the grievance procedure rather than this policy, though the two can overlap; if in doubt, raise the concern and we will make sure it goes down the right route.

3. How to Raise a Concern

3.1 Raise your concern with either Joint CEO - verbally or in writing, as early as you can. You do not need proof; a reasonable belief is enough, and you do not have to be right for the protection to apply. If your concern involves a Joint CEO, raise it with the other. If it involves both, or you do not feel able to raise it internally, you may contact Protect, the whistleblowing charity, for free confidential advice (protect-advice.org.uk), take legal advice, or report to the relevant prescribed body - the list of prescribed persons and bodies is on gov.uk and includes, for example, the Information Commissioner's Office for data protection concerns and the Health and Safety Executive for safety concerns.

3.2 You may raise a concern anonymously, and we will act on it as best we can - but anonymity limits our ability to investigate and to protect and update you, so we encourage you to identify yourself in the knowledge that your confidentiality will be respected.

4. How We Will Respond

4.1 We will acknowledge your concern promptly, assess it, and investigate proportionately - which may mean an internal review, referral to our professional advisers, or reporting to an external authority. We will keep your identity confidential so far as the law and a fair investigation allow, tell you who is handling the matter, and give you feedback on the outcome wherever we properly can. Records of concerns and outcomes are kept confidentially by the Joint CEOs and reviewed annually.

5. Your Protection

5.1 You will not suffer dismissal, detriment or any form of retaliation for making a disclosure you reasonably believe to be true and in the public interest - this protection applies from your first day and regardless of whether your concern is ultimately borne out. Victimising or retaliating against a

whistleblower is a serious disciplinary matter. No agreement with us - including any confidentiality provision - prevents you from making a protected disclosure.

5.2 A concern raised in good faith that turns out to be mistaken will never be held against you. Deliberately raising a false allegation, however, is a disciplinary matter.

6. Related Policies

6.1 This policy works alongside our Bribery and Corruption Policy, Sexual Harassment Policy, Health and Safety Policy and Equality, Diversity and Inclusion Policy, each of which contains its own reporting routes - use whichever feels most natural; a genuine concern will never be turned away for arriving by the wrong door. This policy also forms part of the arrangements for effective employee voice described in our Statement on Fair Working Practices. It is reviewed at least annually by the Joint CEOs.