

Whistleblowing - Speak Up!

About this Policy & who it applies to

At everplay, we are committed to conducting our business with honesty and integrity and we expect all employees to maintain high and principled standards. Any suspected wrongdoing should be reported as soon as possible, and below you will find details and information about how to raise a concern. We encourage open communication from those that work for us, and we want everyone to feel secure about raising and reporting their concerns.

The purpose of this policy is:

- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide staff with guidance as to how to raise those concerns.
- (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy applies to all employees, officers, consultants, contractors, casual workers and agency workers of the everplay group of companies, including all subsidiaries of everplay Group plc (the 'Group'). 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 disclosure of information and 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, any breach of legal or professional obligations and the concealment of any of the above activities.

A whistleblower is a person who raises a genuine concern relating to the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities, you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the company's Grievance Procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from the HR or Legal departments.

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.

- 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.. Once you have reported your concern, the company will assess what action should be taken. You may be asked how you think the matter might best be resolved. If your concern falls more appropriately within other policies, we will tell you.
- During our investigation, we will:
 - tell you who is handling the matter and how you can contact him or her;
 - tell you whether your further assistance may be required; and
 - provide you with a summary of your concern and an outline of how the company proposes to handle it.
- While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.

Confidentiality

- We hope that employees will feel able to voice whistle-blowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate, such that we do not encourage staff to make disclosures anonymously.
- If you raise your concern confidentially to an appropriate member of the company, they will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.
- 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, everplay has 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 everplay.
- Please note that Safecall is an additional service and does not replace other company policies and procedures already in place.

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, a regulator or the police for examples.

If you are dissatisfied

- If you are not satisfied with how your concern was handled, you can appeal to the HR team within 5 working days of receiving the outcome. Your appeal must clearly state why you believe your concern was not properly addressed.
- A meeting may be arranged to clarify your appeal.
- A member of the HR team will review your appeal and how the original concern was handled.
- You will receive a written outcome as soon as possible.

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 (e.g. 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 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.

Speak Up



If you have a serious concern over wrongdoing at work:

Report it to your line manager or HR
 Speak to a senior manager, or
 Contact Safecall

Find a list of freephone numbers at:

www.safecall.co.uk/freephone

or report on line at:

www.safecall.co.uk/report

All calls are treated confidentially by Safecall and you may remain anonymous if you wish.

