

Whistleblowing policy

Part 1: Policy details

1. What does this policy cover, and who is covered?

All employees, contractors, consultants, officers, interns, casual and agency workers are covered by this policy.

It sets out what they should do if they have reason to believe that something dangerous, unlawful or unethical is going on at work and it is affecting (or risks affecting) them or other colleagues.

When you report these kinds of concerns, this is called whistleblowing.

We are committed to operating at all times, and in everything that we do, to the highest standards of integrity.

However, all organizations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes.

Please follow the procedure outlined at Part II of this policy to immediately report any concerns that you have about this kind of conduct, so that we can take the necessary action to address these concerns as fast as possible.

This policy also covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. If you are concerned about a third party, please also raise them with us before approaching anyone else. Jim Shortland or Mihaela Catling will be able to explain how you should proceed.

We will always take your concerns seriously and they will be thoroughly investigated by appropriate personnel. Most importantly, you should feel confident to follow the Part II procedure with confidence. There will be no reprisals for individuals who bring these concerns to our attention – we value and respect all such reports and those who make them to us. We all play an important role in ensuring that our business and everyone working in and with it acts professionally, lawfully and appropriately.

2. It is not part of your employment contract

This policy is not part of your employment contract. We, Reflex Studio Ltd may amend this policy at any time.

3. What sorts of activities are typically considered relevant to whistleblowing?

This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing could include:

- Any activity you suspect is criminal
- Any activity you suspect puts health and safety at risk
- Any activity you suspect may damage the environment
- Any activity you suspect breaches our policy on bribery and corruption
- Any failure to comply with legal or regulatory obligations
- Any failure to meet professional requirements
- Any attempt to conceal one or more of these activities

Please speak to Jim Shortland or Mihaela Catling if you are unsure whether something that you are concerned about is covered by this policy.

Bullying or harassment

If your complaint is about the behavior of others towards you, our bullying and harassment policy or grievance policy contain the relevant guidance on how to proceed. These types of behavior are not covered by this whistleblowing policy.

4. Confidentiality and anonymity

You are always encouraged to raise concerns openly, and we actively discourage anonymous whistleblowing. This is because it is not always easy to manage and to investigate anonymous reports, especially since if we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. In these circumstances, we risk missing evidence or opportunities to gather important supporting information, or identify helpful witnesses, because we may simply be unaware of their existence, in spite of our best efforts to uncover them.

However, if you prefer to keep your identity anonymous, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible. If we need to disclose your identity to others as part of the investigation, we will always discuss with you beforehand both our desire and our reasons for wishing to identify you.

We will protect you from reprisals, and you can read more about how we do this and what rights you have in section 5 below.

5. We protect whistleblowers

There are no reprisals for mistakes or if following our investigations, (which we will always conduct thoroughly and conscientiously), we conclude that there has been no breach of law, policy or unethical conduct. However, to qualify for protection, the disclosure must, in the **reasonable belief** of the worker making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure:

- A criminal offence
- Failure to comply with any legal obligation
- Miscarriage of justice
- Danger to health & safety of any individual
- Danger to the environment, or,
- Deliberate concealment of any of any of the above.

If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you must inform us immediately. You should inform Jim Shortland or Mihaela Catling in the first instance; and if you are not satisfied with the outcome of that conversation, you should follow the process set out in our grievance policy.

We also protect whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others, (including having received threats as a result of raising their concerns), we will take disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct. Whistleblowers may also be entitled to take legal action against those individuals.

If you would like more information about your rights as a whistleblower and how you are entitled to be protected, you can contact Public Concern at Work, which is an independent charity offering a confidential helpline on 020 7404 [6609](tel:02074046609); www.pcaw.org.uk.

6. Whistleblowing to others outside of Reflex Studio Ltd

Our policy covers the process for raising, investigating, and resolving wrongdoing within Reflex Studio Ltd.'s workplace.

The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns raised and to protect you as part of this process.

For these reasons, we anticipate that it would be extremely rare, if ever necessary, for you needing to involve anyone outside of Reflex Studio Ltd as part of this process.

However, we recognize that potentially, in exceptional circumstances, you might wish to involve an external body – an industry regulator, for example – and/or the independent charity Public Concern at Work, who can direct you towards the appropriate regulator for the type of issue you want to raise.

Involving the press/media

Involving the media in a whistleblowing matter often has the effect of inflaming the situation, not assisting it. It can significantly hamper evidence gathering and the willingness of other relevant individuals to support the process.

We therefore strongly discourage you from involving the media. We will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. For example, we would generally expect you to have taken all reasonable steps to deal with the matter internally, or with an external regulator, and to have taken full advice from a lawyer or from Public Concern At Work, before you could justify involving the press.

Part II: Our procedure for raising a whistleblowing concern

Please follow this procedure:

- Raise your concerns with Jim Shortland or Mihaela Catling in the first instance. You may do so in writing or in person.
- If you would prefer not to discuss your concerns with Jim Shortland or Mihaela Catling, or you consider

that your concerns are extremely serious, you should write to Antony Jones

- Please explain that you are raising your concerns as part of the Reflex Studio Ltd whistleblowing policy and procedure. Then set out all the key facts, including names of those involved and all relevant dates.
- You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring someone with you to this meeting – and any subsequent meetings. That companion may be a colleague (or a trade union representative, if relevant). Anyone who accompanies you will be asked to agree to keep strictly confidential the contents of the meeting including any materials disclosed and/or examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you.
- Following this meeting, we will investigate the matters raised and we may request that you come to additional meetings to assist us in our efforts. We may also decide to involve relevant external (or internal) specialists to help us conduct a thorough, fair and responsible investigation.
- Our relevant personnel involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that we may decide to take on our own behalf, we may not be able to share every detail of our discoveries or deliberations with you. We will always endeavor, however, to reassure you, as best as we can, of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
- It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to complain to Antony Jones and request a review of what has been done and concluded.

If you have raised a concern in good faith, our process and all those involved in giving effect to it will support and protect you. However, if a false concern is raised with us in bad faith (e.g. for malicious reasons), we will invoke our disciplinary policy and you may be subject to disciplinary action.

