

WHISTLEBLOWING POLICY

The Company will always do its utmost to act appropriately and to comply with legal and ethical requirements, however, the Company also acknowledges that there is a risk that things go wrong, and that there may be unknowingly some malpractice. The Company is committed to creating a culture where people feel comfortable to speak up and to raise these in a safe and appropriate way.

DEFINITION

Whistleblowing is the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

As well as the Company wanting these things to be raised in a productive and appropriate way, those making qualifying disclosures are also protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that an employee may raise relating to the above matters very seriously.

CREATIVE REMOTE

The Company also actively encourages employees to raise these concerns so that Company can fully investigate and understand them.

Employees must reasonably believe that the disclosure is “in the public interest”. The Company encourage all employees to use this procedure to raise any concerns of this nature.

Should the concern not meet the requirement to be a qualifying disclosure, Employees should raise this under the Company’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the Company will confirm that the matter will be addressed under the grievance policy.

THE PROCEDURE

In the first instance employees should report any concerns to their line manager or where the concern relates to their line manager, or if it is not appropriate to make the report to your line manager, a senior manager or director. All concerns reported will be treated in the utmost confidence.

If an employee does not report their concerns to the Company as set out above, they should take them direct to the appropriate organisation or regulatory body with authority for that area.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

CREATIVE REMOTE

Each step of this process will be managed appropriately and will seek to balance the need to deal with these matters swiftly, but also to ensure that there is a full and appropriate investigation. If an employee has a concern about the time taken at any step, they should raise this with the investigating manager so they can discuss the reasons for the time being taken.

If the employee is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, employees may raise a formal complaint under the Company's grievance policy.

FORMAL ACTION

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

PROTECTION AGAINST DETRIMENTAL TREATMENT

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.