

Protected Disclosure (Whistleblowing) Policy

Updated: April 2024

Applicability: All Ebiquity subsidiaries established in the UK and Europe ("Ebiquity")

This policy does not form part of the contract of employment between Ebiquity and all its employees, contractors or workers. However, any substantial variance to the policy will be fully communicated to all affected persons.

[Introduction](#)

Ebiquity is committed to the highest possible standards of openness, integrity and accountability in all its dealings between staff, managers and all people with whom it comes into contact. In line with that commitment we encourage employees, contractors and others with serious concerns about any aspect of Ebiquity's work to come forward and voice those concerns. Employees are often the first to realise that there may be something seriously wrong within a company. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues, managers or Ebiquity as a whole. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

This policy is intended to provide guidance to all staff who feel they may need to raise certain issues relating to Ebiquity in confidence. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that employees can do something without fear of reprisals. This Protected Disclosure Policy is intended to encourage and enable employees, contractors and other staff engaged by Ebiquity to raise serious concerns **within** Ebiquity rather than overlooking a problem or blowing the whistle outside.

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This policy aims to:

- provide avenues for you to raise concerns and receive feedback on any action taken;
- allow you to take the matter further if you are dissatisfied with Ebiquity's response;
- reassure you that you will be protected from reprisals or victimisation for whistle-blowing in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This policy sets out a framework to promote the responsible and protected disclosures of concerns on the following matters:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with legal obligations which they are subject to;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health and safety of an individual has been, is being or is likely to be endangered;
- a company policy or procedure has been, or may be, breached;
- behaviour which falls below established standards or practice or amounts to improper conduct (especially bribery); or

- information tending to show any matter falling within the matters above has been, is being, or is likely to be concealed.

2. Safeguards

2.1 Harassment or Victimisation

Ebiquity recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. Ebiquity will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith.

This does not mean that if you are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of your whistle-blowing. Nor does it mean that anyone who has blown the whistle on a particular concern will be protected from ever becoming subject to redundancy or disciplinary procedures. It simply means that treatment of any individual who has blown the whistle may not be detrimental as a result of the whistle-blowing action.

2.2 Confidentiality

Ebiquity will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

2.3 Anonymous Allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Board.

In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

2.4 Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make allegations that you know to be untrue and are malicious or simply to cause anger, irritation or distress, disciplinary action may be taken against you.

Procedure – How to raise your concern

Step 1: Approaching your line Manager

If you have a concern about malpractice (as outlined in the Aims section above) we hope you will feel able to raise it first with your line manager, more senior manager or someone in the People team. This may be done orally or in writing. It will help if you state the facts of the matter clearly and outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you should also tell us at this stage. If you are writing, you must be clear how you wish to be contacted regarding the matter.

Step 2: Whistle-blowing

If you feel unable to raise the matter with someone in your immediate line management for whatever reason, please use the internal whistle-blowing service by contacting:

Telephone: +44 (0) 20 7650 9919

E-mail: Whistle.Blowing@ebiquity.com

If you want to raise the matter in confidence we will ensure practical measures are put in place to protect your identity. We will always contact you by the most secure and confidential means. We will not disclose your identity without your consent, unless we are required to do so by law.

Once you have reported your concern, Ebiquity will look into it to assess what action should be taken. Although you are not expected to prove the truth of an allegation, you will need to demonstrate that there are sufficient grounds for your concern. You may be asked how you think the matter might best be resolved. If your concern falls more properly within other company policies (e.g. Grievance, Harassment etc) we will tell you.

Ebiquity will institute the appropriate enquiries, investigations and/or referrals to third parties including the relevant law enforcement authorities and/or external auditors) and will:-

- tell you who is handling the matter and how you can contact him or her;
- say whether your further assistance may be requested; and
- if you request, you will be written to with a summary of your concern and an outline of how Ebiquity proposes to handle it.

If any meeting is arranged, you have the right, if you so wish, to be accompanied by a Trade Union or professional association representative or a friend/colleague who is not involved in the area of work to which the concern relates. Ebiquity accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will receive information about the outcomes of any investigations.

If you are unhappy with Ebiquity's response, you can go to another body detailed below in Step 3. Whilst Ebiquity cannot guarantee that it will respond to all matters in the way that you might wish, the matter will be handled properly and fairly. By using this policy you will help us to achieve this.

Additional guidance for employees in Italy

If you are in **Italy**, you may also report any concerns through a third party whistle-blowing portal which can be found here: <https://areariservata.mygovernance.it/#!/WB/Ebiquity-Italy>

Further guidance on whistle-blowing procedures in Italy can be found in the policies and guidance section of the intranet, here: [Italy Policies](#).

Step 3: External advice

If you are unsure about whether or not to follow Ebiquity policy or you want further independent advice.

If you are in the **UK**, you may contact **Protect**. This is a charity, completely independent of Ebiquity which specializes in providing free and confidential legal advice on how to raise a concern about serious malpractice at work. Public Concern at Work will also help to advise you on whether a circumstance can be properly reported to an additional outside body: -

Telephone: 020 3117 2520

E-mail: whistle@protect-advice.org.uk

Alternatively, if you feel that it is right to take the matter outside Ebiquity, the following routes are available: -

- Ebiquity's Audit Committee Chairman, noted on Ebiquity's website and in annual reports,
- the external auditor, noted on Ebiquity's website and in annual reports,
- relevant professional bodies or regulatory organisations,
- your legal advisor, or
- the police and/or other law enforcement agencies.



If you do take the matter outside Ebiquity, you need to ensure that you do not disclose confidential information or that disclosure would be privileged. Check with the contact point about that.

The Chief People Officer has overall responsibility for the maintenance and operation of this policy. This person maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Board.