

## Whistleblowing Policy

We are committed to conducting our business with honesty and integrity and we expect the same commitment from employees and those working for IMPRESS. Any suspected wrongdoing should be reported as soon as possible to help prevent any real damage being done.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

### What is whistleblowing?

Whistleblowing is the reporting of any suspected wrongdoing or concerns in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations or actions which are intended to conceal any of these.

### How to raise a concern

We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the CEO. If you would prefer to contact someone other than the CEO, you should contact the Chair Walter Merricks or the Senior Non-Executive Director David Robinson.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or friend to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Where an individual feels unable to raise a concern with anyone at IMPRESS they should contact PROTECT (previously known as Public Concern at Work) on 020 7404 6609 (an external whistle-blowing service) who may be able to offer advice.

If an individual is concerned about IMPRESS's ongoing compliance with the Royal Charter, please contact the Press Recognition Panel's whistleblowing service on 0800 374199. Posters with details of this service are displayed in the office.

### Confidentiality

We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to

raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### **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 will be protected from any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the CEO immediately.

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 or with a view to personal gain, the whistleblower may be subject to disciplinary action.

### **Written records**

Written records of concerns raised and their outcomes will be maintained. This will be in a form that does not breach employee confidentiality. Annual reports will be made to the Board of IMPRESS.