

**Whistleblowing Policy**  
**Effective Visual Marketing Ltd. t/a EVM**

**Purpose:** This policy is designed to provide a safe and secure means for employees to report any illegal or unethical activities occurring within the company, without fear of retaliation.

**Scope:** This policy applies to all employees of the company, as well as contractors, consultants, and other third parties working on behalf of the company.

**Definition of Whistleblowing:** Whistleblowing is the act of reporting misconduct or illegal activity within an organisation. It can include reporting violations of laws or regulations, abuse of authority, financial wrongdoing, or any other unethical behaviour.

**Reporting Procedures:** Employees are encouraged to report any illegal or unethical activities to their supervisor or to the human resources department. If an employee does not feel comfortable reporting the issue to their supervisor or HR, they may also report it anonymously through a confidential hotline or online reporting system.

**Training:** The company is committed to training all employees, at all levels of the organisation, on this policy and the importance of reporting misconduct. Training will include information on relevant whistleblowing laws and the company's procedures for handling such reports.

**Fair and Consistent Treatment:** The company is committed to treating all disclosures consistently and fairly.

**Confidentiality:** The company will take all reasonable steps to maintain the confidentiality of employees who report misconduct, upon request. The identity of the reporting employee will not be disclosed, unless required by law or if the employee gives their consent. However, it should be noted that anonymous whistleblowers may not be able to receive feedback on the outcome of their report, and that the company's ability to investigate an anonymous report may be limited.

**Non-retaliation:** The company will not tolerate any form of retaliation against employees who report misconduct in good faith. Any employee found to be engaging in retaliation will be subject to disciplinary action, up to and including termination.

**Gagging Clauses:** Any so-called 'gagging clauses' in settlement agreements do not prevent employees from making disclosures in the public interest.

**Feedback:** The company is committed to providing feedback to whistleblowers, where appropriate and requested. Anonymous whistleblowers may seek feedback through a telephone appointment or by using an anonymised email address.

**Victimisation:** Victimisation of a whistleblower is not acceptable. Any instances of victimisation will be taken seriously and managed appropriately.

**Timeframe for Handling Disclosures:** The company will promptly and thoroughly investigate all reports of misconduct and take appropriate corrective action. The results of the investigation will be kept confidential, except as required by law or as necessary to take corrective action.

**No Evidence Required:** The whistleblower does not need to provide evidence for the company to look into the concerns raised.

**External Resources:** Employees who are considering blowing the whistle can find information and advice from external resources such as the government, Acas, Public Concern at Work, or trade unions.

**Updates:** This policy may be updated from time to time, as necessary.

### **Approval**

This policy has been approved by the appropriate company director and is reviewed annually to ensure its effectiveness and compliance.

Signed



Date

11-Jan-23