



Whistleblowing and Public Interest Disclosure Policy

1. Purpose

1.1. 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.

1.2. This policy covers all employees, officers, consultants, contractors, casual workers and agency workers and is designed to provide guidance to all those who work with or within Impress, including casual and temporary staff, who may from time to time feel that they need to raise certain issues relating to the Company with someone in confidence.

2. What is whistleblowing?

2.1. Whistleblowing is the reporting of any suspected wrongdoing or concerns in relation to our activities.

2.2. This policy applies where you reasonably believe that one of the following sets of circumstances is occurring, has occurred, or may occur within the Company and that your disclosure is in the public interest:

- 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 any legal obligation to which he or she is subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health and safety of any individual has been, is being or is likely to be endangered;
- a suspected breach of the IMPRESS Code of Conduct;
- any instance of behaviour such as harassment, bullying, discrimination;
- the environment has been, is being or is likely to be damaged;
- information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

3. How to raise a concern

3.1. We hope that in many cases you will be able to raise any concerns with your manager. However, if 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 Richard Ayre, or the Senior Non-Executive Director David Robinson.

3.2. We will arrange a meeting with you as soon as possible to discuss your concerns. 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.

3.3. 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.

3.4. If an individual is concerned about Impress' 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.

4. 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.

5. Protection and support for whistle-blowers

5.1. We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Any person who in the public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure is a disciplinary offense. If you believe that you have suffered any such treatment, you should inform the CEO, Chair or Senior Independent Director immediately.

5.2. You must not threaten or retaliate against whistle-blowers 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.

5.3. However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

5.4. Also, you may make such a disclosure to Protect, the leading authority on public interest whistleblowing, if you consider that it has an interest in the matter and, despite the best efforts of Impress, you believe that disclosure within Impress is

inappropriate or as noted previously has been unsuccessful. Disclosures made to legal advisors in the course of obtaining legal advice will be protected.

5.5. If you make any claim or allegation which you do not believe to be true or which you make in bad faith or for personal gain, you may become subject to action under the Disciplinary Procedure which could include dismissal.

5.6. While the Company hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances that are new to it. Each case will be treated on its own facts.

6. Written records

6.1. Written records of concerns raised and their outcomes will be maintained. Where possible, providing such disclosure does not breach confidentiality, you will be advised of the outcome of the investigation in due course. As a minimum, you will be advised when any investigation has been completed and that appropriate action has been taken, although you may not be informed of the specific details of the action that has been taken.

6.2. This will be in a form that does not breach employee confidentiality. Annual reports will be made to the Board of Impress.

6.3. If you are dissatisfied with the outcome of this procedure, you may raise the matter with the CEO, Chair or Senior Independent Director. If you remain dissatisfied with the outcome, you have the right to express your concerns to a relevant [Prescribed Person](#) designated by the Public Interest Disclosure (Prescribed Persons) Order 2014, or any statute or statutory instrument which subsequently supersedes this legislation.

6.4. If you reasonably believe that the relevant failure as listed in any of the above practices relates wholly or mainly to the conduct of a person other than someone at Impress, or any other matter for which a person, other than Impress, has legal responsibility, then you should make that disclosure to that other person.

We are committed to reviewing our policy and good practice annually.

Approved by: The Board of Impress

Date: 12 December 2023

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