

WHISTLEBLOWING POLICY

1 WHY DO WE HAVE THIS POLICY?

1.1 We (PIANOMATCH LTD) want to encourage a culture of openness, supportiveness, and high standards in our company. A **whistleblower** is someone who has genuine concerns about the activity of the company. Where you are thinking of raising concerns as a whistleblower, we want you to have the knowledge that we will take your concerns very seriously and investigate.

1.2 This policy covers how we treat whistleblowers and its purpose is to:

- encourage staff to report suspected wrongdoing as soon as possible.
- provide staff with guidance as to how to raise those concerns.
- reassure staff that they should be able to raise genuine concerns without fear of any penalty, even if they turn out to be mistaken.

1.3 This policy does not form part of your contract of employment or any other contract to provide services, and we may amend it at any time.

2 WHO DOES THIS POLICY APPLY TO?

2.1 This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, interns, and homeworkers who work at our company.

3 WHO IS RESPONSIBLE FOR THIS POLICY?

3.1 The Board of Directors has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

3.2 The Legal team has responsibility for ensuring and overseeing the integrity, independence, and effectiveness of this policy, including the protections in place for those who raise concerns under this policy.

3.3 The Compliance Officer has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance. The Compliance Officer must ensure that regular and appropriate training is provided to:

- all staff to whom this policy applies and those who manage UK-based employees. Such training will include the types of events that may prompt the reporting of a concern, and how to raise concerns under this policy; and
- all managers and other staff who may deal with concerns or investigations under this policy.

3.4 This policy will be reviewed at least annually by the Legal team and the Board of Directors.

4 WHAT IS WHISTLEBLOWING?

4.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers in relation to activities of the company. This may include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery under our Anti-Bribery Policy;
- facilitating tax evasion;
- financial fraud or mismanagement;
- breach of our internal policies and procedures;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- money laundering;
- market abuse;
- breach of our policies on conflicts of interest and dealing with clients;
- negligence; and
- the deliberate concealment of any of the above matters.

4.2 Whistleblowing is different to raising a grievance – which is raising a concern about your own personal circumstances. If you have a concern about your own personal circumstances at work, please follow our Grievance Policy. A copy of our Grievance Policy can be provided by the HR team.

4.3 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out above (for example, a breach of our internal policies), you should discuss with the HR team which route is the most appropriate.

4.4 If you are unsure whether to raise an issue under this policy, you should seek advice from the HR team, whose contact details are set out at the end of this policy.

5 RAISING A WHISTLEBLOWING CONCERN

5.1 We hope that in many cases you will be able to raise any concerns with your line manager in the first instance. You can do this in person, over the phone, or in writing. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may decide in their discretion to refer the matter to the HR team.

5.2 If a matter is more serious, or if you feel that your line manager or the HR team has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- the Compliance Officer or the Legal team

5.3 Their contact details are set out at the end of this policy.

5.4 The HR team will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

6 PROTECTION FROM RETALIATION AND SUPPORT FOR WHISTLEBLOWERS

6.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.2 Under UK law, whistleblowers must not be treated worse at work due to raising a genuine concern as a whistleblower. For example, detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR team immediately. If the matter is not addressed, you should raise it formally using our Grievance Procedure.

6.3 If you are investigated as part of someone else raising a concern, 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 and, where relevant, we may be required by law to make a report to the relevant regulator. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

7 CONFIDENTIALITY

7.1 In the spirit of helping us improve things at the company, we would hope that you feel you can voice your concerns openly. However, we know that raising a concern can be difficult and if you feel you need to keep things confidential, we will respect this as far as we can whilst also addressing your concern. For example, if it is necessary for a third party to get involved to help investigate it further, we may need to disclose some information with them. We will discuss disclosing information with you where we need to do this.

7.2 For the purposes of helping us address any concerns raised, we do not encourage staff to raise concerns anonymously, although we will make every effort to investigate these concerns anyway. You should be aware that proper investigation may be more difficult or impossible if we cannot obtain more information from you. It is also more difficult to establish whether any allegations are credible.

7.3 Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the HR team and appropriate measures can then be taken to preserve confidentiality.

7.4 If you are in any doubt, or feel you need to speak to someone independent outside of the company, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

8 INVESTIGATION AND OUTCOME

8.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be asked to attend additional meetings in order to provide further information to help with this assessment.

8.2 Where necessary, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to learn from any issues changed and help us prevent the issue arising again in the future.

8.3 We will aim to keep you informed of the progress of the investigation and how long it is likely to take. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation, an outcome, or any disciplinary action taken as a result. You should treat

any information about the investigation as confidential.

8.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

9 PROCEDURE IN THE EVENT OF AN UNSATISFACTORY OUTCOME

9.1 We will always try to deal with your concern fairly and in an appropriate way but this might not lead to the outcome you anticipate or desire.

9.2 If you are not happy with the way in which your concern has been handled, you can raise it with the HR team. Contact details are set out at the end of this policy.

10 RAISING CONCERN IN THE MEDIA

10.1 The aim of this policy is to provide an internal mechanism for reporting, investigating, and addressing any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

10.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available on the GOV.UK website at:

www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2.

10.3 We strongly encourage you to seek independent advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are set out at the end of this policy.

10.4 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a client, supplier, or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first in line with this policy. You should contact the HR team for guidance.

11 RECORD KEEPING AND REPORTING

11.1 We will keep an internal record of all concerns raised under this policy, and the outcome of any investigations.

11.2 This helps us understand the concerns raised and enables our Board to learn from them in the future. For the purpose of protecting confidentiality, we do not record names in this report, only the subject matter of the concern and the outcome.

12 CONTACTS

12.1 Below are all the contact details that have been referenced throughout this policy. If you have any questions or feedback about any of the content in this policy, please direct them to your line manager or the HR team.

Human Resources

Tel: 020 7870 1682
Email: humanresources@pianomatch.com

Compliance Officer

Daniel Peattie
Tel: 020 7870 1682
Email: compliance@pianomatch.com

Legal

Tel: 020 7870 1682
Email: legal@pianomatch.com

Protect (independent, external whistleblowing charity)

Helpline: 0203 117 2520
Email: info@protect-advice.org.uk
Website: <https://protect-advice.org.uk/contact-protect-advice-line/>

13 COMMENTS ON THIS POLICY

13.1 Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the Compliance Officer where appropriate.