

# Whistleblowing Policy



## Introduction

The Company strives to create an open and transparent workplace culture where employees who raise whistleblowing concerns are supported and treated fairly. We recognise that raising a concern can be daunting, this policy aims to encourage employees to report suspected wrongdoing or malpractice as soon as possible and safe in the knowledge that their concerns will be taken seriously, confidentially and without fear of reprisal.

## Scope

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you. It applies to all employees employed by Acorn Web Offset Ltd. Clients, customers, agency workers, casual workers, contractors or visitors are also encouraged to follow the procedure set out in this policy.

Suggestions for ways in which this policy may be improved are welcomed and should be addressed to the Managing Director.

## Responsibilities

Every manager and employee has a personal responsibility for the implementation of the policy.

## Managers

Managers are responsible for ensuring that all employees are aware of this policy and its application, and for creating an environment in which employees can express concerns freely and without fear of reprisal.

## Employees

All employees have a responsibility to raise concerns under the circumstances set out in this policy providing they have a reasonable belief that malpractice and/or wrongdoing has occurred or likely to occur.

## Definition

### What is whistleblowing?

Whistleblowing is the term used when a person reports suspected wrongdoing, illegal activity, or risks (like fraud, safety hazards, or corruption) within their company, disclosing it internally or externally to protect the public interest. It's legally known as "making a disclosure in the public interest" and provides legal protection for the person reporting (the whistleblower) from unfair treatment or job loss.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation that your contract of employment has been breached), you should raise it under our separate Grievance Policy.

### What types of concerns are covered under this policy?

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, the concern raised must fall into one of the following categories:

- Conduct which is an offence or a breach of law, including but not limited to corruption, fraud or bribery
- A miscarriage of justice
- A risk to the health and safety of an individual
- Causing damage to the environment
- A Criminal offence
- A failure to comply with legal obligations
- Concealment of any of the above

## Raising a whistleblowing concern

The Company will ensure all whistleblowing concerns raised are investigated thoroughly and promptly whilst ensuring all parties are treated with respect and provided with adequate support and protection.

If you raise a genuine whistleblowing concern in accordance with this policy you have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) even if you turn out to be mistaken. This includes any concern that has occurred or is likely to occur.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should raise this under our Harassment and Bullying Policy. Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

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## How to raise a whistleblowing concern internally

**1.1** In many circumstances, the easiest way an employee can get their concern resolved will be to raise it with their line manager. If this is not appropriate as the concern relates to their line manager, for example, the employee believes that management is involved, the employee may then make a concern direct to any of the following:

- Managing Director
- Other members of Management
- HR

**1.2** The whistleblowing concern should be reported in writing (including email) and should provide the following information:

- The name of the person raising the concern and contact details
- The names of any individuals involved dates and places where possible
- The details of the suspected wrongdoing (including evidence, photos, videos)
- Whether you've already raised the concern with anyone else and their response

In some cases, it may be necessary to ask the employee to attend a meeting to clarify the nature of their concern. This will be arranged as soon as possible.

Employees may be accompanied by another person of their choosing (providing that that person is not involved in the investigation) during any meetings or interviews in connection with the suspected wrongdoing. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

Where it is considered appropriate, a member of HR may also be present.

## Responding to your whistleblowing concern

**1.3** Within five working days of a concern being raised, the line manager who received the whistleblowing concern will write to the employee setting out the following:

- Acknowledgement that the concern has been received, the date it has been received, whether the person who raised the concern has requested confidentiality, and a summary of the concern.
- Indicating how the matter will be dealt with and by whom and the timescale for completion and if further assistance is needed from them.

Following the investigation, the designated manager will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

## Appeal

**1.4** If you are not satisfied with how your concern has been dealt with, you should appeal to a more senior manager than the manager who handled the original concern or to the Managing Director or HR.

You can raise your appeal in writing within 7 working days of the outcome letter. It is important that you set out clearly the reasons why you believe your concern was not properly addressed.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a work colleague or a trade union representative with you to the meeting. Where it is considered appropriate, HR may also be present.

The relevant manager will consider your grounds for appeal and review the way your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

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## Confidentiality and Anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously.

We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate, and we will not be able to protect your position or provide you with any feedback.

Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

## Malicious claims

No disciplinary or other action will be taken against an employee who makes an allegation in the reasonable belief that

it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against an employee who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

## Raising your whistleblowing concerns externally

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on GOV.UK).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

## Further guidance

If you need further guidance or support, you can contact; the whistleblowing charity Protect <https://protect-advice.org.uk> or Acas guidance on 'Whistleblowing at [www.acas.org.uk/whistleblowing-at-work](http://www.acas.org.uk/whistleblowing-at-work)

## Policy Review

This policy does not form part of employees' contracts of employment, and the Company reserves the right to amend or update this policy at any time to reflect changes in legislation and best practices. Employees will be notified of any changes to the policy.

Version	Date of Change	Summary of Change
1.0 – January 2026		New Policy