



‘SPEAK UP’ POLICY (WHISTLE BLOWING)

1. AIMS OF THIS POLICY

At the Betfred Group, we want a workplace that is free from any wrongdoing and with a culture where employees know they can raise genuine concerns, without fear of victimisation or dismissal, and know that the business will take concerns raised seriously and investigate them thoroughly and sensitively.

We view speaking up as a positive act; it is not disloyal to individuals or the business to speak up, providing you have a genuine concern. We want the Betfred Group to be free of any wrongdoing and malpractice as it is vital for the long-term success of the business and for the wellbeing of employees. We cannot achieve this without the help of employees speaking up when they have a genuine concern.

This policy explains how you can raise a genuine concern about wrongdoing or malpractice within the Betfred Group. Reporting an issue of wrongdoing is also known as ‘whistleblowing’ and in certain circumstances is protected by law. Certain disclosures are known by law as “qualifying disclosures.” Please read **Appendix 1** below for more information on this.

Bullying, harassment, or any other detrimental treatment of an individual who has raised a concern is completely unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

2. SCOPE OF THIS POLICY

This ‘Speak Up’ policy is not intended to replace existing HR policies relating to you as an employee. If you have such a concern, please refer to the company Employee Handbook on how you can raise an issue.

3. WHO THIS POLICY APPLIES TO:

This policy applies to **all**:

- employees of Betfred based in the UK. There are separate whistleblowing arrangements for non-UK employees, please consult your company Employee Handbook or contact your local HR function for assistance
- employees of contractors working for the company in the UK, for example, agency staff
- employees of suppliers trading with Betfred in the UK
- those providing services under a contract or other agreement with Betfred in the UK
- voluntary workers / interns / work experience placements with Betfred in the UK

4. WHAT SHOULD BE REPORTED

Any genuine concern that you have about an activity or transaction connected to the company or the conduct of a Betfred Group employee or someone acting on behalf of the company that:

- makes you feel uncomfortable because it falls below normal standards
- is not following the usual company process and does not look or feel right

- appears to benefit the individual more than the company
- is not in keeping with the company's policies and culture
- is improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or other discrimination
- health and safety of the public and/or employees
- damage to the environment
- unauthorised use of funds or other assets
- fraud, bribery, or corruption
- other unethical conduct.

This is not an exhaustive list.

When raising a concern, you should provide as much detail as possible, including:

- the nature of your concern and why you believe it to be true
- who your concern relates to, including any individuals external to the company. For example, a supplier or contractor
- Specific dates and locations
- the scale of your concern – amounts involved, number of instances or the duration
- names of any witnesses to the wrongdoing
- any relevant background or history or other information that you feel is important
- Your name and contact details - we encourage you to put your name to your allegation as if you do not tell us who you are, it will be much more difficult for us to protect you, for you to assist us with an investigation or for you to receive feedback. Additionally, malicious allegations are easier made anonymously.

Although you are not expected to prove anything beyond doubt, you will need to demonstrate that you have a genuine concern relating to suspected wrongdoing and that you have reasonable grounds for raising your concern.

Any concern raised will be investigated thoroughly, promptly, and confidentially. The timescales of the investigation will vary depending on the complexity and seriousness of the issue.

It is important to note that if an individual reports a concern and, after investigation, we find that this is malicious and that there are no grounds for the allegation against another individual or the company, the company may take disciplinary action.

5. WHO TO RAISE YOUR CONCERN TO

In the first instance you should discuss your concern with your Line Manager to sense check and avoid a misunderstanding. However, if you know, or have good reason to suspect your Line Manager is involved then you should report your concern using this dedicated company email address:

- Speak.Up@betfred.com

Richard Jones, Group Internal Audit Manager is responsible for monitoring this account and for ensuring that any subsequent investigations take place.

We may contact you to help with our understanding of your concern and to assist the investigation. If we invite you to a meeting to discuss your concern, you can ask a colleague, a union representative or a friend to be present for support.

If you prefer to discuss or raise a concern by phone please contact Richard Jones, Group Internal Audit Manager on:

Mob: +44 7964 914844

If your concern relates to the Group Internal Audit Manager or the internal audit team then contact **Nicky Walsh, Group People Director** by email or telephone:

Mob: +44 7814 583038

Email: nicky.walsh@betfred.com

In the unlikely event your concern is about both Group Internal Audit and Group HR then you can raise your concern directly to **Jo Whittaker, Group CEO** to:

Email: joanne.whittaker@betfred.com

6. SUPPORT AND OUR PROMISE TO YOU

We understand that raising a concern can take courage and we want to support you throughout what may feel like a challenging time.

Firstly, we will acknowledge your concern as quickly as possible. The business will do what it can to minimise any difficulties that you may experience because of raising a concern, including temporarily re-deploying you for the duration of an investigation. If you give evidence in criminal or disciplinary proceedings, the business will arrange for you to receive appropriate advice and support.

Where necessary, we may put you in touch with relevant support organisations, such as the Employee Assistance Programme (EAP). For those individuals who raise a concern but are not company employees, Betfred will provide appropriate advice and support wherever possible.

Remember that any investigation is likely to take time and conducted under terms of strict confidentiality i.e., by not informing anyone, including you and those involved until (or if) the appropriate time.

If the decision is not to investigate, we will provide you with an explanation why. It is important that you understand the reason for no further action.

The amount of contact between you and the investigator/s will depend on the nature of the matter raised, the complexity of the investigation and the clarity of the information you provide.

Any meetings between you and the those investigating can take place away from your workplace, if you wish, and a colleague, your union representative or a friend may accompany you in support.

We want you to feel that we have dealt with your concern properly.

Unless there are any legal reasons, we will keep you informed of the outcome of any investigation.

7. POLICY OWNER AND REVIEW

The policy owner is the Group Internal Audit Manager, and this policy will be reviewed annually.

Policy info

Version No.	Date of change	Summary of change

QUALIFYING DISCLOSURE

A “qualifying disclosure” means a disclosure of information that an employee genuinely and reasonably believes is in the public interest and shows that the company has committed a “relevant failure” by:

- a) Committing a criminal offence
- b) Failing to comply with a legal obligation
- c) A miscarriage of justice
- d) Endangering the health and safety of an individual
- e) Environmental damage or
- f) Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The company will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur and the disclosure is made “in the public interest”.

We strongly encourage you to report a concern internally in the first instance. However, in exceptional or urgent circumstances, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies examples of which are:

- The health and Safety Executive
- HM Customs and Revenue
- The Environment Agency
- The Office of Fair Trading
- The Police
- Serious and Organised Crime Authority; and
- The Financial Conduct Authority

We strongly encourage you to seek advice before reporting a concern to anyone outside the business.