

Speak Up Policy

Why do we have a policy?

We aim to have a culture of openness and accountability in Future, one that provides an avenue for colleagues to 'speak up' without fear of reprisal, which provides the Company with the opportunity to address concerns swiftly and potentially avoid serious regulatory breaches, reputational damage or external disclosures. We take concerns raised seriously and commit to identifying and remedying wrongdoing.

This policy will ensure that colleagues' concerns are investigated appropriately and action is taken to resolve these matters fairly. Please note this does not form part of the grievance procedure, so if a colleague has an issue with their treatment within the workplace, they may need to refer to the Grievance Policy. This policy outlines how colleagues can raise concerns (speak up) internally, or where necessary, independently of line management.

Who does this policy apply to?

This policy applies to all colleagues of Future Publishing Limited and third parties working on behalf of Future. For the avoidance of doubt, all positions detailed below are included:

- Employees and workers (including home-workers, permanent, fixed term, temporary and casual workers)
- Senior Managers
- Officers
- Directors
- Colleagues (Home workers, Permanent, fixed-term, temporary casual workers)
- Consultants
- Sub-contractors/Freelancers
- Trainees/Apprentices
- Seconded colleagues

This policy is designed to work in conjunction with our Conflict of Interest Policy, Anti Bribery Policy and Anti-Slavery and Human Trafficking Policy.

This policy does not form part of colleagues' contracts of employment and the Company may change this policy at any time.

General Principles

'Speaking Up' is a phrase often used to cover situations where individuals reveal details of wrongdoing by or affecting their employer. In certain circumstances colleagues and agency workers who fairly highlight such issues of concern are protected from dismissal or other detriment by the Public Interest Disclosure Act 1998 ("the Act").

In order for a colleague or agency worker to gain legal protection they must have made a protected “qualifying disclosure”. This is briefly explained below.

What is a “qualifying disclosure”?

The provisions of the Act (and case law) are extremely complex and it would be difficult to cover them comprehensively in this policy document. In simple terms, colleagues and agency workers are protected from the effects of making disclosures concerning breaches of legal obligations, which show that criminal offences have occurred (or might occur) or that health and safety is compromised i.e. they should not be dismissed or be at a detriment as a result of the disclosure.

The Policy is designed to enable colleagues to raise genuine concerns about anything they consider to show serious wrongdoing or poor behaviour this could be related to the following - please note this list is not exhaustive:

- Improper conduct or unethical behaviour
- Criminal activity
- Failure to comply with legal obligations
- Financial irregularity, fraud, dishonesty
- Danger to health and safety
- The offering or receiving a bribe as a reward to act improperly
- Exploiting another person for commercial or personal gain e.g. slavery, compulsive behaviour or human trafficking
- Deliberate breaches of Future’s systems, policies or procedures
- Attempts to conceal any of the above

The Speak up policy is primarily for concerns where public interest is at risk, which includes a risk to the wider public, customers, colleagues or the organisation itself.

When is a qualifying disclosure protected?

In order for a qualifying disclosure to be protected it must be made to an appropriate person or body and should usually be dealt with as an internal matter in the first instance. On rare occasions it may be appropriate to report matters to an outside agency or the media as a first step.

Procedure

Colleague Responsibilities

The usual procedure for voicing any concerns is to discuss these with your Line Manager. However due to the severity and sensitivity of some issues, we realise it may be difficult or impossible for colleagues to do so. these cases, they can raise their concerns with the following people:

Head of Department
 Chief People Officer
 Head of Legal
 Any ELT or Board Member

Sometimes, you may feel reticent about raising concerns. If you have a genuine concern and do not wish to approach management directly, or wish to report your concern anonymously, then you can feel comfortable that you can use the external confidential Speak Up phone line.

The Speak up line is managed by the independent charity Protect. They provide free, confidential advice on 'speak up' matters. Their contact details are:

Call: 020 3117 2520

Email: whistle@protect-advice.org.uk

The advice line is open Monday-Friday, 9am-6pm their experienced advisers can talk you through your options and help you raise a concern about malpractice at work.

Please be aware that completely anonymous disclosures are difficult to investigate, however if a colleague would like to raise their concerns confidentially we will make every effort to keep their identity secret and only reveal it where necessary, with those investigating the concern. Please note sometimes we may need to share information for further investigation so anonymity can sometimes not be guaranteed.

Due to the varied and often complex nature of these sorts of disclosures we are unable to give exact timescales, however once completed the colleague will usually be informed of the outcome, however there may be some situations where this is not the case.

If, having reported a matter, the colleague does not believe that it is being appropriately addressed they should use the company's grievance procedure. If still not resolved, or in an emergency, the colleague should report the matter to an appropriate outside body (such as the Health and Safety Executive).

So long as the colleague genuinely believes the information to be true and the matter is 'in the public interest' or could reasonably be believed to be, the company will treat all such reports with respect and will protect the colleague from reprisals, whether or not their report is eventually proved to be correct. If the colleague believes that they are being subjected to unfair treatment in connection with such a report, they should raise a grievance complaint using the process as set out in the Grievance Policy.

Colleagues who discuss the matter externally in order to take legal advice are also protected. However, malicious or vexatious reports may be dealt with as misconduct under the company's disciplinary procedure and might result in the dismissal of those concerned.

Management Responsibilities

Managers will investigate allegations of wrongdoing within the workplace or otherwise refer such allegations for investigation. Colleagues and agency workers who raise such allegations must be treated with respect and be assured that the matter will be properly investigated and necessary steps taken.

Any colleague or agency worker who penalises another, whether formally or otherwise, in connection with a protected qualifying disclosure will be subject to disciplinary action.

All of the above-mentioned colleagues and anyone performing services for or on behalf of Future must comply with this policy. Failure to comply with any aspect may result in disciplinary action up to and including dismissal as well as criminal offences.

ALTERNATIVE REPORTING METHODS

If your concern relates to GoCompare.com Limited and you are uncomfortable reporting using the methods above then you can also contact the Financial Conduct Authority.

- Call: +44 (0)20 7066 9200 during office hours or leave a message
- Email: whistle@fca.org.uk
- Write to: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN

Want to know more?

If you have any questions in relation to this policy, please contact People and Culture at peopleandculture@futurenet.com for further information.

Issue and Amendment Record

Version No	Date	Author	Amendment
4.0	June 2021	Bethan Bailey	Annual review: updated policy references & layout, corrected grammatical errors., rebranded following acquisition and added speak up contact details.
5.0	October 2021	Bethan Bailey	Following sign off by the Board, renamed policy to 'Speak Up' and updated all whistleblowing references
6.0	December 2021	Bethan Bailey	Updated Speak up helpline details