

Speak Up Policy

1. About this policy.

- 1.1. Future aims to cultivate a culture of openness and accountability, providing colleagues with a means to 'speak up' without fear of reprisal. This enables Future to address concerns promptly, potentially avoiding serious regulatory breaches, reputational damage, or external disclosures. Future takes concerns raised seriously and commits to identifying and remedying wrongdoing.
- 1.2. The purpose of this policy is:
 - 1.2.1. To encourage colleagues to report suspected wrongdoing as soon as possible, ensuring their concerns are taken seriously and investigated appropriately, with confidentiality respected.
 - 1.2.2. To provide guidance on how to raise those concerns.
 - 1.2.3. To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if those concerns turn out to be mistaken.

2. Scope of the Speak Up policy.

- 2.1. This policy applies to anyone working for a company in the Future plc group. It covers any person wishing to raise concerns covered by this policy, including all employees, officers, consultants, freelancers, contractors, volunteers, interns, casual workers, and agency workers.
- 2.2. This policy does not form part of any contract of employment or other contract to provide services and may be amended at any time.

3. What it means to 'Speak Up'.

- 3.1. 'Speaking up' refers to sharing concerns about serious wrongdoing. It involves disclosing information related to suspected wrongdoing or dangers concerning the activities of Future. This may include:
 - 3.1.1. Criminal activity.
 - 3.1.2. Failure to comply with legal or professional obligations or regulatory requirements.
 - 3.1.3. Miscarriages of justice.
 - 3.1.4. Danger to health and safety.
 - 3.1.5. Damage to the environment.
 - 3.1.6. Breach of internal policies and procedures.
 - 3.1.7. Conduct likely to damage Future's reputation or financial wellbeing.
 - 3.1.8. Breaches of equality or civil rights laws.
 - 3.1.9. Bribery (under the [Anti-Bribery and Corruption Policy](#)).
 - 3.1.10. Facilitating tax evasion.
 - 3.1.11. Fraud or financial misconduct.
 - 3.1.12. Money laundering.
 - 3.1.13. Market abuse.
 - 3.1.14. Breach of policies on conflicts of interest and dealings with clients (under the [Conflict of Interest Policy](#)).
 - 3.1.15. Non-financial misconduct such as sexual misconduct, bullying, or intimidation.
 - 3.1.16. The deliberate concealment of any of the above matters.
- 3.2. This policy should not be used for personal complaints, such as treatment at

work. In such cases, the Grievance Policy or Bullying/Harassment Policy should be used.

- 3.3. If a complaint relates to personal circumstances but also includes wider concerns regarding any public interest issue outlined in section 3.1, the person raising the issue, or their line manager, may hold a confidential conversation with the Head of Legal or the General Counsel to determine which policy best suits the circumstances.

4. Speak Up procedure.

For individuals wishing to Speak Up:

- 4.1. The usual procedure for voicing concerns is to discuss these with the line manager, either in person or in writing. Concerns may be raised during one-on-one meetings or in any comfortable environment. The line manager may agree on a way to resolve the concern quickly and effectively and may refer the matter to the Head of Legal or General Counsel if necessary.
- 4.2. In cases where the issue is serious or sensitive, or if the line manager has not addressed the concern satisfactorily, the individual may contact one of the following:
 - 4.2.1. The General Counsel.
 - 4.2.2. The Head of Legal.
 - 4.2.3. The Head of Compliance.
- 4.3. In this policy we refer to the person to whom the disclosure is made, whether that is the line manager or one of the people listed in section 4.2, as the 'Confidant'.
- 4.4. In some circumstances, it might be appropriate for a disclosure to be made anonymously. Anonymous disclosures can be made using the information set out in section 5.3.
- 4.5. Where appropriate, the Confidant should arrange a meeting as soon as possible to discuss the concern. It may not be appropriate, or possible, to arrange such a meeting where a disclosure is made anonymously. In those circumstances (and any other circumstances in which it is undesirable, difficult, or impossible to arrange such a meeting), an investigation may be commenced in accordance with section 6 below based on the information available.
- 4.6. If the concern relates to a Future company that is regulated by the Financial Conduct Authority (such as Go.Compare), individuals may choose to raise concerns with the regulator at any time. While raising all concerns directly with Future in the first instance is encouraged to enable appropriate investigation and resolution, it is not an absolute requirement. Therefore, if someone should wish to make a disclosure directly to the Financial Conduct Authority, they are able to do so. Internal and external processes can run simultaneously or consecutively. Relevant contact details are provided at the end of this document.

- 4.7. If the Confidant cannot resolve the issues raised immediately themselves, they may refer the matter for investigation in accordance with section 6 below.

For Confidants:

- 4.8. The Confidant must take the individual who is speaking up seriously, treat them with respect, and assure them that the matter will be investigated properly if it cannot be resolved immediately.
- 4.9. If the concerns can be resolved when first raised, the Confidant should arrange a call with the Head of Legal or the General Counsel to confidentially discuss what has happened, take advice as appropriate, and make arrangements for the next steps required, if any. The Confidant should always inform the person making the disclosure that they can discuss matters further with the Head of Legal or General Counsel.
- 4.10. If the colleague's concerns cannot be resolved at the point of first contact, the Confidant should contact the Head of Legal or General Counsel, providing a detailed summary of the issues as the Confidant understands them. The Head of Legal or General Counsel will make arrangements for the issues disclosed to be investigated further.

For everyone at Future:

- 4.11. Everyone at Future has a duty to familiarise themselves with this policy so that they are able to recognise a situation in which someone is speaking up. People who speak up may not describe it in those terms.
- 4.12. There must be no threats or retaliation against colleagues who speak out in any form, from line managers or anyone else. Involvement in such conduct may result in disciplinary action, and in some circumstances Future may need to report such conduct to a regulator such as the Financial Conduct Authority.

5. Confidentiality.

- 5.1. Colleagues should feel able to speak up openly under this policy. If an individual wants to speak up confidentially, every effort will be made to keep their identity secret. If it becomes necessary for anyone investigating the concern to know that person's identity, this will be discussed with the person who has spoken up.
- 5.2. Although efforts will be made to investigate anonymous disclosures, anonymous reporting is not encouraged. Proper investigation may be more difficult or impossible without further information. Additionally, establishing the credibility of allegations would be made more challenging. Colleagues concerned about potential reprisals if their identity is revealed should speak to the Head of Legal or General Counsel, or other contact points listed in section 4 so that appropriate measures can then be taken to preserve confidentiality.
- 5.3. In those rare circumstances where anonymous disclosure is appropriate, colleagues can submit a report via a dedicated anonymous reporting tool

provided by EthicsPoint. You can find more information about the EthicsPoint reporting service, including how to make a report, at <https://future.ethicspoint.com/>

- 5.4. Colleagues in the United Kingdom can also get free confidential advice from Protect, the independent whistleblowing charity. Their details are found in section 10 below. Protect does not provide a reporting service for Future - anyone who wishes to make a report should refer to the information in section 5.3.

6. Investigations.

- 6.1. Once a concern has been raised under this policy, Future will conduct an initial assessment to determine the scope of any investigation required. In most circumstances, the investigation will be led by the Head of Legal or General Counsel. If it is inappropriate or impossible for them to lead the investigation (for example, if matters disclosed related to the conduct of the Legal department), another individual detailed in section 4 may take the lead. The lead investigator may delegate aspects of the investigation to a person in their team, provided that the person to whom they delegate is suitably skilled and experienced.
- 6.2. Other colleagues may be involved in the investigation if their knowledge or expertise is required to properly investigate the issues raised. Those colleagues will be sufficiently senior and will be independent of any involvement in the issues raised. This means that people in the same management line as the people involved in the matters disclosed will not usually be involved in investigating. Additional meetings may be required to gather further information.
- 6.3. In some cases, if the matters disclosed are particularly serious or complicated, Future may appoint an independent external investigator or team of investigators with relevant experience of investigations or specialist knowledge of the subject matter to conduct all or part of the investigation.
- 6.4. Everyone involved in the investigation will be subject to an obligation of confidentiality. They will only share information or discuss the investigation with those who need to know that information. A person who speaks up under this policy should also treat any information about the investigation as confidential.
- 6.5. Future will try to keep the person who made a speak up disclosure under this policy informed of the general progress of the investigation.

Outcomes and next steps

- 6.6. The person who spoke up will usually be informed, in general terms, of the outcome of the investigation where it is feasible and appropriate to do so. Sometimes the need for confidentiality may prevent disclosure of specific details of the investigation.
- 6.7. The investigator(s) may make recommendations for change to minimise the risk of future wrongdoing.

- 6.8. Future cannot guarantee the outcome a person who speaks up may seek, but it will always deal with genuine speak up concerns fairly and in an appropriate way.
- 6.9. If a person who speaks up is not happy with the way in which their concern has been handled, they can raise it with one of the other people listed at section 4.2 above or the Chair of Future's Audit Committee, whose details are available on request from the person conducting the investigation.
- 6.10. If the investigator concludes that someone has used this policy to make false allegations maliciously, that person may be subject to disciplinary action. This will not apply if the person who made the disclosure did so in the reasonable belief that the matters they were raising were true, even if they turn out to be mistaken.

7. External disclosures.

- 7.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases it should not be necessary to alert anyone externally.
- 7.2. The law recognises that in some circumstances it may be appropriate to report your concerns to an external body such as a regulator (see section 4.6 above in relation to raising concerns with the Financial Conduct Authority). Future strongly encourages anyone who wishes to speak up to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. It will very rarely, if ever, be appropriate to alert the media.
- 7.3. Speak Up concerns usually relate to the conduct of colleagues, 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 those who speak up if they raise the matter with the third party directly. However, Future strongly encourages colleagues to report such concerns internally first in line with this policy. Colleagues should contact their line manager or one of the other individuals set out in section 4.2 for guidance.

8. Protection for people who Speak Up.

- 8.1. It is understandable that people who speak up are sometimes worried about possible repercussions. Future aims to encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 8.2. People who speak up under this policy must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If someone who has spoken up believes that they have suffered any such treatment, they should inform their line manager, the Head of Legal, or the General Counsel immediately. If the matter is not remedied, they should raise it formally under Future's Grievance Policy.

9. Record keeping and reporting.

- 9.1. Future will keep an internal record of all concerns raised under this policy, and the outcome of any investigations. This will also form a part of Future's audit reporting.
- 9.2. The operation and effectiveness of Future's Speak Up systems and controls will be reported to its Audit Committee at least annually. Future will ensure the confidentiality of any individuals who make disclosures under this policy for the purposes of that reporting.
- 9.3. For disclosures that relate to any Future business that is regulated by the Financial Conduct Authority (such as Go.Compare), Future will report to the Financial Conduct Authority the outcome of any employment tribunal cases where an individual has successfully based all or part of their claim on either detriment suffered as a result of making a protected disclosure in breach of section 47B of the Employment Rights Act 1996 or being unfairly dismissed under section 103A of the Employment Rights Act 1996.

10. Contacts.

Financial Conduct Authority	Contact details for whistleblowing team: Telephone: +44 (0)20 7066 9200 Email: whistle@fca.org.uk Postal address: Intelligence Department (ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN Website: www.fca.org.uk/firms/whistleblowing
Protect (independent whistleblowing charity)	Helpline: 0203 117 2520
Head of Legal	Christopher Flanagan
General Counsel	David Bateson
Head of Compliance	Debbie Pugh

Want to know more?

If you have any questions in relation to this policy, please contact the [Legal Team](#) 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	Bethan	Updated Speak up helpline details
7.0	2021 August	Bailey	Annual Review completed, removed speak up hotline details, as hotline didn't provide whistleblowing service, just advice.
7.1	2023	Bethan	Annual review, amended some alignment and removed 'Compliance' as report route.
	August 2023	Bailey	
		Bethan Bailey	
8.0	August 2024	Rhian Francis	Annual review. Grammatical errors amended. Amended to third person format. Consider using sensitivity labels for internal documents. Amendment to qualifying disclosure definition. Approved 22/8/2024

<p>9.0</p>	<p>November 2024</p>	<p>Christopher Flanagan</p>	<p>Overall amendment of policy to clarify procedures and scope. Accommodation of transfer of policy ownership to Legal.</p> <p>Removed references to Future Publishing Limited specifically, clarified that this policy applies to all at Future.</p> <p>Removed references to UK legislation.</p> <p>Clarified public interest threshold.</p> <p>Amended reporting routes to align with law, guidance, best practice, and practical necessities.</p> <p>Review for compliance with SYSC sourcebook.</p> <p>Updated reporting routes.</p> <p>Clarification of investigation process, outcomes, and consequences.</p>
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