

**FEATURE
SPACE**

OUTSMART RISK

Whistleblowing Policy

Version 2.0

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Introduction

This is our Featurespace policy on Whistleblowing.

Featurespace takes malpractice and impropriety extremely seriously. We maintain an effective mechanism and process to deal with legitimate concerns and or complaints that are raised to the Whistleblowing Officer.

This policy aims to encourage people to feel confident about raising serious concerns and to question and act upon them without fear of victimisation or harassment.

What is whistleblowing?

In this policy 'Whistleblowing' means the reporting of suspected misconduct, illegal acts, or failure to act within Featurespace core values.

Scope

Featurespace is committed to creating a work environment with the highest possible standards of openness, transparency, and accountability. In view of this commitment, we encourage Whistle-blowers with serious concerns about the work of Featurespace to come forward and voice their concerns without fear of reprisal.

Featurespace has a pre-existing complaints procedure that in many cases will be more appropriate for third parties to follow. However, if it is believed that the complaint fits the description of a 'relevant concern' outlined below, then the concerns may be reported using the whistleblowing policy procedure.

What is a relevant concern?

If a Whistle-blower is asked to do something, or is aware of the actions of another, which they consider to be wrongdoing, it can be raised using this procedure.

A Whistle-blower may decide to raise a concern under the whistleblowing policy if a situation arises that is felt:

- amounts to improper conduct; or
- is an abuse of power for personal gain.
- is against Featurespace procedures and protocols.

The types of matters regarded as a relevant concern for the purpose of this procedure include, but are not limited to, the following:

- Harassment, violence or bullying
- Abuse of human rights
- Drug or alcohol abuse
- Conflicts of interest
- Improper use of social media
- Dangers to Health and Safety

- Misuse of confidential info or data breach
- Improper use of company assets
- Illegal behaviour
- Fraud or Financial malpractice
- Corruption, bribery, or blackmail

Whistle-blowers should not raise malicious or vexatious concerns, nor should they raise knowingly untrue concerns.

Who can raise a concern?

- Featurespace employees and contractors
- Employees of contractors working for Featurespace
- Supplier employees
- Customers
- General Public

How to raise a concern

When raising a concern under the procedure the Whistle-blower should try to provide the following information:

- the background and reason behind the concern
- whether they have already raised a concern with anyone and the response
- any relevant dates when actions related to the concern took place.

This information should demonstrate that there are reasonable grounds for the concern to be acted upon. It is important that matters are not investigated by the Whistle-blower themselves.

If applicable, personal interests must be declared from the outset.

Concerns can be raised using any of the below contact details.

Whistleblowing Officer
Featurespace
140 Science Park,
Milton Road,
Cambridge
CB4 0GF

Tel: 01223 345940

Email: whistleblowing@featurespace.co.uk

Or via, the confidential concern form available on the Featurespace website or intranet

If the concern raised relates to the Whistleblowing officer, please raise the concern with the Chief Legal Officer.

Confidentiality & Anonymity

The best way to raise a concern is to do so openly, as this makes it easier for Featurespace to investigate and provide feedback.

Any disclosures made under this procedure will be treated in a sensitive manner. However, Featurespace recognises that the Whistle-blower may want to raise a concern in confidence, e.g., they may want to raise a concern on the basis that their name is not revealed without their consent.

Featurespace will respect any request for confidentiality as far as possible, restricting it to a 'need to know' basis. However, if the situation arises where it is not possible to resolve the concern without revealing the Whistle-blower (for example in matters of criminal law), Featurespace will advise them before proceeding. The same considerations of confidentiality will be afforded to the recipient(s) at the centre of the concern, as far as appropriate.

Featurespace always encourages potential Whistle-blowers to speak up about potential serious wrongdoing in a way that they feel comfortable. Whistle-blowers may choose to raise concerns anonymously. If this is the case, the investigation itself may serve to reveal the source of information. Whistle-blowers are therefore encouraged, where possible to put their names to concerns raised. When anonymous concerns are raised, they will be treated as credible and investigated so far as possible.

Anonymous concerns can be raised using the Confidential Concern Form available on the Featurespace website or on the employee intranet.

How a concern will be dealt with

Featurespace will respond to the complaint as quickly and as sensitively as possible. An investigation will be conducted to understand and assess the complaint. While Featurespace cannot guarantee that the outcome will be as the Whistle-blower may wish, it will handle the matter fairly and in accordance with this procedure.

The investigation will be carried out under strict confidentiality, i.e., not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate and in the interests of public safety the matter may be reported to the police.

Within 10 working days of receipt of the complaint the whistleblowing officer will write to the whistle-blower acknowledging the complaint and explaining the next steps in the investigation. At this point should it be necessary and with the whistle-blower's consent, HR may be engaged as a support mechanism for the whistle-blower.

Featurespace will minimise the impact to the whistle-blower in terms of time taken. However, it's important to note that in certain circumstances where the complaint is complex an approximately aligned amount of details will be required to ensure a full and comprehensive review can take place.

Throughout the investigation the whistle-blower will regularly be kept informed of progress.

Safeguarding the whistle-blower

Throughout this process the whistle-blower can expect the following:

- full support from senior management
- their concerns to be taken seriously
- help and support from Featurespace throughout the investigation
- all concerns to be treated in confidence and every effort will be made not to reveal the whistle-blower's identity if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to act as a result of the disclosure without the help of the whistle-blower, so they may be asked to come forward as a witness. In this event, the whistle-blower will be offered advice and support.

Completion and closure of a complaint

Upon completion of the investigation, where possible an update will be provided to the whistle-blower. The level of detail provided will depend on the nature of the findings and the sensitivity of the outcome.

If a Whistle-blower makes an allegation but it is not confirmed by the investigation, no action will be taken against them. However, if a malicious or vexatious allegation is made without good reason to: cause trouble; for personal gain; or to discredit Featurespace, an investigation may take place.

Should you not be happy with the investigation outcome you may escalate the matter to the Chief Legal Officer for a further review.

Recording and monitoring

A register will be held of all whistleblowing complaints that have been received along with their outcome. This will be a confidential and sensitive governance exercise and will only be available for review by the Head of Risk and the Chief Legal Officer.

What support do I have?

Featurespace will support all employees throughout the investigation process. In addition, Employees are also encouraged to use the Featurespace employee assistance programmes if they feel that they require a different type of support.

However, if you require legal advice with respect to your obligations under this Policy or the Whistleblower Laws, then you must contact an external lawyer (not our in-house legal team).

Under this policy we are not able to give any type of advice regarding any type of incident that may involve criminal conduct.

Revision History

Version	Date	Changes	Author
1.0	18 November 2018	New document	L. Smith (Head of Risk)
1.1	13 September 2019	Reviewed and updated	D. Edey (Risk and Compliance Analyst)
1.2	2 April 2020	Updated process to reflect anonymised form and role of Chief Legal Officer	H. Smith (Business Process Analyst)
2.0	12/08/2021	Annual Review	L Smith