

Whistleblowing Policy

Introduction

Let Me Play Limited is committed to the highest standards of openness, integrity and accountability in all its activities and is committed to ensuring that no employee should feel at a disadvantage in raising legitimate concerns.

The Company understands that at one time or another, employees may have concerns about activities at work and these concerns are usually easily resolved. However, when these concerns relate to legal breaches, considerable misconduct by another person, other malpractice or unlawful activity impacting on others, employees may be unsure of how to raise the issue.

The aim of this policy is to encourage the disclosure of wrongdoing, but it also highlights the protection given to any employees who report malpractice, as provided under the Public Interest Disclosure Act, ("PIDA"), which gives legal protection to employees against being dismissed or penalised by their employer as a result of publicly disclosing certain serious concerns. Above and beyond the protection offered by the PIDA, the Company is thoroughly committed to ensuring that individuals are:

- confident in raising serious concerns and the Company will take them seriously and as far as possible, treat them confidentially
- provided with a suitable process for raising concerns
- reassured that they will be protected from any detriment or reprisals for raising a concern

Scope of Policy

This policy is designed to enable employees to raise concerns internally, at a senior level, and to disclose information which the individual believes shows malpractice or impropriety. The policy is intended to cover concerns which are in the public interest and may, at least initially, be investigated separately but might then lead to the invocation of other procedures e.g. the disciplinary procedure. Such concerns include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Miscarriages of justice
- The deliberate concealment of information relating to any of the above.

This list is not intended to be exhaustive.

It should also be noted that this policy is not intended to cover individual's private concerns about their employment which should primarily be raised via the Company's Grievance Policy.

The Company takes malpractice very seriously and therefore encourages not only employees but also agency staff, contractors and suppliers to be open and honest about any concerns of impropriety they may have.

Malpractice or impropriety relating to employment matters will be dealt with under the Company's Disciplinary or Grievance Procedures, as appropriate. Employees who wish to raise a complaint of malpractice or impropriety which relates to their employment should do so through the Company's Grievance Procedure.

Safeguards for Protection

Protection is provided for employees who disclose such concerns if the disclosure is made:

- In the public interest
- In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below)
- It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure

In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Raising a Concern

If you have a concern regarding conduct within the Company which you believe tends to show malpractice relating to the categories specified, you should raise the concern immediately, or as soon as reasonably practical, with a Company Director, who will ensure a thorough investigation is carried out. All investigations will be carried out as quickly as possible; however, the time taken to complete the investigation will vary depending on the nature of the alleged malpractice. Should the investigation become prolonged, the individual who raised the concern will be notified and kept informed as to the progress of the investigation and when it is expected to be concluded.

Employees will not be treated unfavourably or suffer any detriment on the grounds that they have made a disclosure providing that:

- The disclosure has been made in good faith
- The individual reasonably believes that the information in the allegation is substantially true

If you feel that raising your concerns with a particular Company Director would not be appropriate in the circumstances, or would cause a conflict of interest, you should bring it to the attention of one of the other Company Directors.

Alternatively, you can raise a formal complaint under the Company's grievance procedure if you feel that would be more appropriate in the circumstances.

Confidentiality

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required. If this is the case, individuals will be reassured and reminded that they are protected from detriment when making genuine disclosures in the public interest.

Anonymous Allegations

The Company encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible but may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the complaint raised
- The credibility of the concern
- The likelihood of confirming the allegation from the attributable sources

External Disclosures

The Company would always advocate that you raise any concerns internally in the first instance so that we can address these. However, disclosures can be made to an appropriate 'prescribed person' who is external to the Company, if applicable. Breaches in health and safety law, for example, can be brought to the attention of the Health and Safety Executive or appropriate local authority. A full list of 'prescribed persons' can be obtained from the Gov.uk website if the Company is unable to address your concerns in the first instance.

Appeals

If the person who raised the allegation is dissatisfied with the outcome of their complaint, they will be given the opportunity to appeal. The outcome of any such appeal will be regarded as final.

Malicious Allegations

If any disclosure is made in bad faith, for personal gain or relates to information that the employee believes is untrue then this will constitute a disciplinary offence under the Company's Disciplinary Procedure and may lead to a disciplinary sanction up to and including summary dismissal.

Victimisation

If you feel that you are being subjected to a detriment or being victimised as a result of your disclosure you must inform a Company Director immediately who will take appropriate action to protect you. If you feel that you have been subjected to a detriment you may also follow the Grievance Procedure.

It is a disciplinary offence to victimise anyone who has brought a disclosure in the public interest and has a reasonable belief that it is true.