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Signed			
Date	**Version**	**Name**	**Role**
21/02/25	2025.02.1	Jack Watson	Managing Director
02/10/25	2025.09.3	Jack Watson	Managing Director
05/08/2026	2026075	Jessie Kelly	Head of Legal & Compliance
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Contents

Overview & Introduction 3
Scope 3
What is Speaking Up? 4
Reporting a Concern 4
Confidentiality 5
Investigation and Outcome 5
If you are not satisfied 5
External Disclosure 6
Disciplinary Action 6
Protection and Support for Whistleblowers 6
Contact Details 7
Further Help and Support 7

Overview & Introduction

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential to prevent wrongdoing occurring and to address it if it does occur. We encourage open dialogue and believe in addressing concerns directly and constructively.

Tina Sexton & Jessie Kelly have overall responsibility for the operation of this policy but may delegate elements of implementation or decision-making to HR Department Team Members.

This policy is reviewed regularly to ensure it remains up to date and in order to monitor its effectiveness. Any changes required will be implemented and communicated to our workforce.

This policy aims to:

- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- provide staff with guidance as to how to raise those concerns; and
- reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

Scope

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual workers and agency staff (collectively referred to as “staff” in this policy).

This policy covers the disclosure of genuine concerns regarding suspected wrongdoing, misconduct, illegal activities, or dangers relating to the Company's operations, employees, customers, suppliers, partners, reputation, or the wider public interest. This may include, but is not limited to, the following:

- Criminal activity
- Fraud
- Bribery
- Failure to comply with any legal or regulatory obligation
- Miscarriages of justice
- Assault
- Danger to the health & safety of any individual
- Damage to the environment
- Assault, harassment or sexual harassment
- Gross negligence or serious misconduct
- Breach of Company policies or procedures
- Conduct likely to bring the Company into disrepute
- Deliberate concealment of any of the above matters.

This policy should not be used for complaints relating to your personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

If you are unsure whether a concern falls within the scope of this policy, advice can be sought from one of the designated Whistleblowing Officers.

What is Speaking Up?

Speaking up, or whistleblowing, is the disclosure of information relating to suspected wrongdoing, misconduct, illegal activity, or dangers in the workplace.

A **whistleblower** is an individual who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or negligence affecting any of our activities, you should report it under this policy.

Related documents include:

- REC001 - Modern Slavery Statement.pdf
- POL011 IT User Policy
- POL035 - Complaints Policy.pdf
- POL043 - Fraud, Bribery & Money Laundering Policy.pdf
- POL050 - Social Engineering Fraud Policy.pdf
- POL057 - Privacy Policy and Cookie Notice.pdf
- POL058 - Supplier Code of Conduct.pdf
- POL067 Sexual Harassment Policy
- POL080 - Mediation and Grievance Policy.pdf

Reporting a Concern

We hope that in most cases you will be able to raise any concerns with your line manager or HR. You may inform them in person or in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to one of the Whistleblowing Officers.

However, where the matter is more serious, or you feel that your concern has not been addressed, or where you prefer not to raise it with them for any reason, you should contact a Whistleblowing Officer.

Useful information that can be included in your report includes:

- The name of the person(s) alleged to have committed the act or responsible for the incident.
- The nature of the alleged act or incident.
- The date(s) and time(s) when the alleged act or incident occurred.
- The names of any witnesses or other individuals who may be able to assist with the investigation.
- Any action already taken by you to stop or address the alleged act or incident.
- *If the person is not an employee, details of who they are and where they work.

All allegations will be investigated thoroughly and treated as a disciplinary matter. Each case will be considered on its individual circumstances and managed in accordance with the principles set out in our Disciplinary and Dismissal Policy.pdf.

You will not be subjected victimisation, retaliation, or any detrimental treatment for raising a genuine concern in good faith.

Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, you have the option to do so, and we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, it will be discussed with you.

Should disclosures be made anonymously, it may result in investigations being more difficult or impossible where we cannot obtain further information from the reporter. Staff who are concerned about possible reprisals if their identity is revealed can come forward to a Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

Investigation and Outcome

We will provide you with an opportunity to discuss your concern with us as soon as possible, should you wish to do so. You may bring a colleague or union representative to any meetings under this policy. Your companion will be required to respect the confidentiality of your disclosure and any subsequent investigation.

Following this meeting, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. Depending on the complexity of the matter, you may be requested to provide further information to assist in reaching a suitable outcome. In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a member of staff has raised a concern under this procedure maliciously, or without having any reasonable grounds for doing so, action may be taken against the member of staff under the disciplinary procedure. In extreme cases, this could result in dismissal.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not satisfied with the way in which your concern has been handled, you can raise it with another key contact. Contact details are set out at the end of this policy.

External Disclosure

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Alternatively, you can make your disclosure anonymously through an independent third party, Navex EthicsPoint Incident Management. Contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer or supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or the Human Resources department or one of the other individuals set out at the end of this policy for guidance.

Disciplinary Action

If the decision is that the allegation of sexual harassment or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with our disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/victimisation may appeal by using our disciplinary appeal procedure.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

If, due to the investigation, it is concluded that your complaint is both untrue and has been brought with malicious intent, an investigation will be instigated which may result in disciplinary action being taken against you.

Protection and Support for Whistleblowers

It is understandable that whistleblowers may at times be concerned about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff 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 you believe that you have suffered any such treatment, you should inform a Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

Contact Details

Bytes Whistleblowing Officer: Tina Sexton, Finance Director - Tina.Sexton@bytes.co.uk

Chair of the Board of Directors: Gavin Rochussen
Per: WK Groenewald, Group Company Secretary - WK.Groenewald@bytesplc.com

Navex EthicsPoint Incident Management: Independent reporting portal
Web: https://bytes.ethicspoint.com
(online form and phone option available)

Mobile URL: https://bytes.navexone.eu

Mobile QR code:

Further Help and Support

Protect: Independent External party providing whistleblowing guidance
Helpline: 0203 117 2520
E-mail: whistle@protect-advice.org.uk
Website: www.protect-advice.org.uk