

PUNCH

Inspiring those moments

Whistleblowing Policy

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1. Our Whistleblowing Policy

At a glance: At Punch we are committed to dealing with any concerns about the company openly, responsibly and confidentially. If you have any genuine concerns about something to do with the company – for example, you believe mismanagement or malpractice has occurred, or may occur in the future – we naturally want to know about this as soon as possible.

This policy sets out our procedure for raising concerns about incidents of malpractice or mismanagement in the workplace, and how we will deal with those concerns. This could relate to any practice, procedure or policy carried out by any officer or Punch team member – for example, a breach of rules, irregularity, a danger to our team members or our customers, financial malpractice, breach of legal obligations, or something that may damage the environment.

Overview

The Public Interest Disclosures Act 1998 encourages staff to raise their concerns internally about wrongdoing in the workplace.

This includes concerns about:

- someone having committed, or being likely to commit, a criminal offence.
- a failure to comply with any legal or regulatory obligation.
- a miscarriage of justice.
- something which endangers the health and safety of an individual.
- damage to the environment.
- fraud or financial irregularity.
- blackmail, corruption, or bribery.
- sexual harassment.
- deliberate concealment relating to any of the above.

Wrongdoing is anything that it is illegal, improper or unethical, and may impact the Punch's image and/or profits. Misconduct and malpractice can happen in any company and can go undetected and unpunished if those who know about it are afraid to speak out. Individuals are therefore encouraged to come forward with any information if they feel it is appropriate to do so.

Any disclosure made that is thought to be true, even if it turns out that you are mistaken, will be protected by this policy if you have a reasonable suspicion that malpractice has occurred, is occurring or is likely to occur. We do, however, ask that Punch team members do not carry out investigations of their own accord, as this could cause issues with any future investigation or alert individuals and result in the destruction of evidence.

2. How to report a concern

Our primary aim is to prevent workplace malpractice from occurring in the first place. If it happens, we want to prevent it from recurring. If appropriate, we will make every effort to resolve the situation promptly. If that isn't possible, we will then take further action to investigate the matter fully and take appropriate action.

Initial Report

If you have a concern about workplace malpractice, you should first discuss it with your line manager or Head of Department. They will attempt to resolve the matter as promptly as possible.

There may be circumstances where you feel unable to approach your line manager or Head of Department. If so, you can raise your concerns directly, in confidence, with one of the people listed below.

Chief Financial Officer – Matt Ward
Email: matt.ward@punchpubs.com

Group People Director – Laura Cavendish
Email: laura.cavendish@punchpubs.com

Head of Legal – Tom Harvey
Email: tom.harvey@punchpubs.com

3. How will Punch investigate?

Any individual alleged to have carried out wrongdoing will be dealt with in accordance with the Punch's Ethics and Code of Conduct Policy, the formal Disciplinary Procedures Policy and if necessary, the law. They will be notified of the allegation made against them as soon as is practically possible.

Punch will carry out an internal investigation and, if necessary, will also call-in external support or report the matter to the Police if required. However, any Punch team member reporting a wrongdoing can be assured that Punch will deal with the matter sensitively and confidentiality will always remain a priority.

The investigation will be carried out as quickly as possible. It is not possible to lay down precise timescales for the investigation as this very much depends on the nature of the allegation, and Punch will wish to carry out suitable enquiries.

Punch will write to the individual who has notified us of the alleged wrongdoing, to acknowledge the complaint, and the Punch team member will be kept informed on the progress of the investigation and once concluded, the outcome.

4. Confidentiality and unfounded allegations

Confidentiality

So far as possible, Punch will not disclose your identity, if known, at any time, unless it's necessary to do so for the purposes of our investigations, to obtain legal advice, or to comply with a legal or regulatory obligation.

This applies provided you:

- raise any genuine concerns and not out of malice
- have reasonable grounds for believing your concerns to be true, and
- have complied, in full, with the spirit of the policy and the process set out above.

While we will take every effort to ensure your identity is not disclosed, if it becomes necessary to identify you for the reasons stated above, we will not do this without discussion with you.

We are committed to ensuring that you are not subjected to any harassment, victimisation, or disciplinary action because of raising your concerns. And, as far as possible, any supporting evidence relating to your disclosure will be always kept secure.

Unfounded Allegations

If you make an allegation that is not confirmed by subsequent investigation, no action will be taken against you. However, malicious allegations may result in disciplinary action against you.

5. Additional Information

Other helpful policies and guides

If you're interested in our whistleblowing policy, you may also want to read our:

- Bribery Policy
- Ethics and Code of Conduct Policy

Protect - Advice, founded in 1993, is a leading authority on public interest whistle blowing. Its charitable objectives are to promote compliance with the law and good practice in organisations across all sectors. In practical terms, it focuses on the responsibility of workers to raise concerns about malpractice, and the responsibility of those in charge to investigate and remedy such issues.

Protect - Advice provides free advice and assistance to individuals who are concerned about wrongdoing in the workplace.

Protect - Advice can be contacted on 020 3117 2520 or use their website [Protect - Advice Website](#).

Version Control

Version Number	Author	Purpose/Change	Date
1.0	Donna Gracey	Final Version approved by Exec Board	July 13
2.0	Donna Gracey	Changes to method of reporting any issues	August 18
2.1	Donna Gracey	Updates to email addresses and department names	Feb 22
2.2	Donna Gracey	Updates to email addresses and department names	May 23
2.3	Donna Gracey	Updates to email addresses and department names	Feb 25
2.4	Kirsty North	Update to Additional information – company name change	Feb 26