WHISTLEBLOWING POLICY

1.0 INTRODUCTION

Middlesbrough Football Club ("Club") are committed to conducting our business with honesty and integrity and we expect all staff to maintain these high standards. It is important to the Club that any fraud, misconduct or wrongdoing by workers or officers of the Club is reported and properly dealt with. The Club therefore encourages all individuals to raise any concerns that they may have about any suspected wrongdoing within the Club.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This Policy applies to all employees and officers of the Club including agency workers, contractors, interns and volunteers and sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

The law provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence;
- bribery;
- facilitation of tax evasion;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal or professional obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is the Club's responsibility to ensure that an investigation takes place.

A worker who makes such a qualifying disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

The Club encourages workers to raise their concerns under this procedure in the first instance. If a worker is not sure whether or not to raise a concern, they should discuss the issue with their Department Manager or the HR Department.

2.0 PRINCIPLES

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.

- No worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the Club's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to the HR Department or the Board Director.

This Policy is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the Club's grievance procedure.

3.0 REPORTING PROCEDURE

In the first instance, and unless the worker reasonably believes their Department Manager to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach their Department Manager, any concerns should be raised with the worker's Department Manager or the HR Department. Any approach will be treated with the strictest confidence and the worker's identity will not be disclosed without their prior consent.

If the worker does not feel comfortable to approach their Department Manager or the HR Department directly, they can contact **Anon Whistleblowing**, an independent whistleblowing helpline on **0800 1601787** or **anon-whistleblowing.co.uk**. They will listen carefully to the worker's concerns and inform nominated personnel within the Club so the matter can be investigated. The worker has the option to remain completely anonymous when using this service.

4.0 INVESTIGATION

Once a concern has been raised, the matter will be investigated. The investigation may involve the Worker and other individuals involved giving a written statement or a recorded verbal statement. The worker's statement will be taken into account, and they will be asked to comment on any additional evidence obtained. The Investigator will then report to Robin Bloom, Group General Counsel and representative for the Board, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the Investigator will report the matter to the HR Department and start the disciplinary procedure. On conclusion of any investigation, the worker will be told the outcome of the investigation and what the Board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained. If on conclusion of the investigation, the worker reasonably believes that the appropriate action has not been taken, they should report the matter to the relevant authority.

5.0 DATA PROTECTION

When an individual makes a disclosure, the Club will process any personal data collected in

accordance with the HR Privacy Notice. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

This policy does not form part of the employee's contract of employment and we may amend it at any time.