Halo Benefits

POLICY

Whistleblowing Policy

How to raise a concern about wrongdoing, and how we protect you.

UPDATED	VERSION	NEXT REVIEW
23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
Date approved	23rd November 2026
Next Review Date	23th November 2027
Review frequency	Annually
Applies to	All directors, employees, workers, contractors, agency staff, interns, volunteers and former staff of Halo Benefits Ltd
Related policies	Code of Conduct and Business Ethics, Anti-Bribery and Corruption Policy, Modern Slavery Statement

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of the policy

We want people to speak up when they believe something is wrong. This policy explains how to raise a concern about wrongdoing at Halo Benefits Ltd, how we will handle it and the protection you have. It reflects the Public Interest Disclosure Act 1998, which protects workers who report wrongdoing in the public interest.

2. Scope

This policy applies to **Halo Benefits Ltd** (company number 17577358) and to all directors, employees, workers, contractors, agency staff, interns and volunteers. Former staff can also use it. It covers concerns in the public interest, including:

- criminal offences, including fraud, bribery, money laundering and tax evasion;
- failure to meet a legal obligation, including data protection law;
- miscarriages of justice;
- danger to anyone's health or safety;
- damage to the environment;
- modern slavery or human trafficking;
- serious breaches of our policies or unethical conduct; and
- deliberately covering up any of the above.

Personal complaints about your own employment, such as pay or a dispute with a colleague, are normally handled under our grievance procedure unless they also affect the public interest.

3. How to raise a concern

You can raise a concern with:

- your line manager, if you feel comfortable doing so;
- our designated Ethics Director, a director appointed by the Board, whose details are given to all staff when they join;
- any other director, if the concern involves the Ethics Director; or
- by email to **compliance@halobenefits.co.uk**.

You can raise a concern verbally or in writing. It helps to give the background, relevant dates and names, and why you are concerned. You do not need proof: a reasonable belief is enough.

4. Independent advice

If you are unsure whether or how to raise a concern, you can get free, confidential advice from Protect, the UK whistleblowing charity, on 020 3117 2520 or through its website. Protect is independent of Halo Benefits. You can also seek advice from a trade union or a solicitor.

5. Reporting outside the company

We hope you will feel able to raise concerns with us, but you do not have to. The law also protects disclosures made to "prescribed persons": regulators and other bodies listed in legislation. Examples relevant to our business include:

Type of concern	Who to contact
Data protection and information rights	Information Commissioner's Office
Health and safety	Health and Safety Executive
Tax and national minimum wage	HM Revenue and Customs
Serious fraud, bribery or corruption	Serious Fraud Office
Competition law	Competition and Markets Authority
Environmental matters	The Environment Agency (England) or the Scottish Environment Protection Agency (Scotland)
Company law and directors' conduct	Secretary of State for Business and Trade

Disclosures to the media or other third parties are only protected in limited circumstances, so we strongly recommend taking advice from Protect first.

6. Confidentiality and anonymity

We treat every concern confidentially and only share your identity with those who need to know in order to investigate, unless you agree otherwise or the law requires it. You can raise a concern anonymously, but this can make it harder to investigate and to give you feedback. Raising a concern confidentially, rather than anonymously, is usually more effective.

Nothing in any contract, settlement agreement or non-disclosure agreement with Halo Benefits Ltd prevents anyone from making a protected disclosure.

7. No retaliation

No one who raises a genuine concern will suffer dismissal, disciplinary action, threats or any other unfair treatment as a result, even if the concern turns out to be mistaken. Anyone who victimises a whistleblower, or tries to stop someone raising a concern, will face disciplinary action, which may include dismissal. Individuals can also be personally liable for victimisation under the law.

Deliberately making false allegations, maliciously or for personal gain, is a disciplinary matter.

8. How we handle a concern

We will:

- acknowledge your concern within five working days;
- appoint an investigator with no involvement in the matter, or an external investigator for serious matters;
- keep you informed of progress and the expected timescale, while respecting the confidentiality of others;
- tell you the outcome where appropriate, and what action has been taken; and
- keep a confidential record of the concern, the investigation and the outcome.

If you are not satisfied with how your concern has been handled, you can escalate it to the full Board or contact a prescribed person.

9. Roles and responsibilities

- **Board of Directors:** makes sure concerns are properly investigated and reviews the anonymised whistleblowing record at least once a year.
- **Ethics Director:** receives concerns, arranges investigations and protects whistleblowers.
- **Managers:** take concerns seriously, pass them to the Ethics Director promptly and never discourage reporting.
- **Everyone:** raises genuine concerns and cooperates with investigations.

10. Breaches of this policy

Breaches of this policy, including retaliation or breaking a whistleblower's confidentiality, are handled under our disciplinary procedure and may amount to gross misconduct.

11. Review

This policy is reviewed annually, and sooner after any significant change in the law, or after any whistleblowing case that shows how the policy could be improved. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> QUESTIONS ABOUT THIS POLICY?
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> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.