



Whistleblowing Policy

Group Secretariat

2 Waterhouse Square
140 Holborn
London
EC1N 2AE

T: 0207 157 6565
E: groupsecretariat@itv.com

AUGUST 2019

Whistleblowing

ITV's assurances under the Whistleblowing Policy:

- A whistleblower's job will not be put at risk
- Reprisals against whistleblowers are not tolerated
- A whistleblower's identity will not be disclosed unless required by law (subject to limits – see below)

Confidentiality:

- ITV may not be able to pursue a concern without evidence
- As other individuals may be able to guess the identity of an anonymous whistleblower, it may not be possible for ITV to guarantee protection from reprisal.

Introduction

At one time or another we have all had concerns about how things are being done at work. Usually these concerns are easily resolved. However, when the concern isn't about your own position but is about a risk to colleagues, clients or the Company, it can be difficult to know what to do. Examples include:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal, compliance or regulatory obligation (including breach of local broadcasting or advertising codes);
- Dangers to health and safety or the environment;
- Child protection and safeguarding
- Criminal activity;
- Breach of the Company's Code of Conduct;
- Attempts to conceal any of the above

You may feel worried about raising such an issue and decide to keep your concern to yourself, perhaps feeling that it is none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or the Company itself. Perhaps you have tried to raise the matter, but found that you have spoken to the wrong person or raised the issue in the wrong way and are not sure whether to take it further.

The Board and management of ITV plc would prefer that you raise any such concerns at an early stage and this policy has been devised to help everyone who works within the ITV Group of companies to do this in the right way, whether an employee, temporary or agency worker, or a sub-contractor.

If something is troubling you that you think ITV should know about or look into, please use this policy.

If you want to bring a complaint or grievance in relation to your own position, please use the Bullying, Harassment and Grievance Procedures appropriate to your area of the Group.

The Whistleblowing process described in this policy is for concerns where the interests of others, or of ITV are at risk, including concerns about actual or possible breaches in the future under ITV's Fraud and Bribery policy.

If in doubt – raise it!

Our Assurances

Your safety

ITV assures you that it will not take or tolerate reprisal against anyone who raises a concern under this policy. Provided that you are acting with honesty it will not matter if your concern proves to be mistaken. Of course ITV does not extend this assurance to someone who maliciously raises a matter they know to be untrue.

Your confidence

With these assurances ITV hopes you feel able to raise any concern openly. However, we recognise that there may be some circumstances when you would prefer to speak to someone in confidence. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when ITV is unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how best to proceed.

This process is not suitable for concerns raised anonymously (i.e. when someone does not want to give their name). This is because we are unable to protect that person from reprisal or give them any feedback and also because anonymity makes it much more difficult to investigate the concern raised. Accordingly, whilst ITV will consider anonymous reports, you should not assume that we can provide the assurances we offer in the same way, if you raise your concerns anonymously.

How ITV will handle the matter

Once you have raised your concern, ITV will assess it and consider what action is appropriate. This may involve an informal review, an internal enquiry or a more formal investigation. You will be told who will be handling the matter, how you can contact them, and what further assistance may be needed from you. If you ask, we will write to you summarising your concern and setting out how ITV proposes to handle it. We may not be able to tell you how long any investigation will take, but we will try to ensure that you are kept up date.

When you raise the concern it will be helpful to know how you think the matter might be resolved. If you have a personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within Bullying, Harassment or Grievance procedures, we will tell you.

Wherever possible, ITV will give you feedback on the outcome of any investigation. Please note that we will not be able to tell you about disciplinary, or other action, when it would infringe a duty of confidence ITV owes to another person.

Whilst ITV cannot guarantee that it will respond to all matters in the way that every employee might wish, it will try to handle any such concern fairly and properly.

There is a reporting process in place and ultimately the ITV plc Audit Committee will receive and review reports on Whistleblowing.

How to raise a concern

Please remember that you do not need to have firm evidence of malpractice to raise a concern.

If you are unsure whether or how to raise a concern, or you want confidential advice, you can contact the independent charity **Protect** on **0800 008 6120** or by e-mail at advice26@protect-advice.org.uk.

If you are calling from overseas we have set up the following Freephone numbers to enable you to contact **Protect**, with translation services in place where appropriate.

Territory	Telephone number
Australia	1800 205 106
Denmark	802 50538
Finland	0800 918 152
France	0805 632 006
Germany	0800 101 3121
Hong Kong	0800 966239
Italy	0800 985 551
Netherlands	0800 0200270
Norway	0800 10901
Sweden	0200 214926
USA	1 866 648 2080

When raising a concern we would encourage you to follow the steps below. Please do not investigate a concern yourself. It is important that you do not discuss your concern with others.

To raise a concern:

Step One

If you feel able to raise your concern openly with your line manager this is the best course. This may be done orally or in writing.

Step Two

If you feel unable to raise the matter with your supervisor or you think he or she has not properly addressed the concern at Step One, please raise it with a senior manager, your local Managing Director or one of the designated contacts listed below:

Business Area	Name	Direct Line	Email
Health and Safety	Ruth Denyer	0207 157 3842	ruth.denyer@itv.com
Child Protection and Safeguarding	Ruth Denyer	0207 157 3842	ruth.denyer@itv.com
Programme Compliance	Chris Wissun	0207 157 3250	chris.wissun@itv.com
Corporate Compliance	Eleanor Irving	0207 157 6563	eleanor.irving@itv.com
Finance or Procurement	Sharjeel Suleman	0207 157 6560	sharjeel.suleman@itv.com
Central Legal	Kyla Mullins	0207 157 6531	kyla.mullins@itv.com
Tax	Jonathan Hanna	0207 157 6606	jonathan.hanna@itv.com
UK Studios	Justine Rodgers	0207 157 3435	justine.rodgers@itv.com
Broadcasting, Commercial and Online	Sarah Clarke	0207 156 6708	sarah.clarke@itv.com
Leeds/Manchester HR	Rachel Gledhill	0113 222 7062	rachel.gledhill@itv.com
HR Services	Jane Wroe	0161 952 1130	jane.wroe@itv.com
Global Entertainment/International Studios	Paul Lewis	0207 157 6532	paul.lewis@itv.com
The Garden	Nicola Hill		nicola.hill@thegardenproductions.tv

If you are based in one of our overseas offices you can obtain the appropriate policy from your HR contact.

Step Three

If you have followed the steps above but believe that the malpractice is continuing, or if that the matter is so serious that it cannot be dealt with through either of these steps, then please raise it with the contact listed below:

Name	Position	Direct Line	Email
Margaret Ewing	Non-executive director, ITV plc	0777 031 8564	-

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

External Advice

If you are unsure whether or how to raise a concern or you want confidential advice, you can contact the independent charity Protect (formerly Public Concern at Work) on **0800 008 6120** or by e-mail at advice26@protect-advice.org.uk.

You may also seek advice from your union if you are a member, or should you prefer from your own lawyer.

ITV is committed to good governance and fully endorses the principle of accountability. If a concern about malpractice cannot be resolved within ITV there are circumstances where external disclosure (whether to a regulator or more widely) is both lawful and appropriate. Advice on these circumstances is available from Protect.

Further Information

Protect

www.protect-advice.org.uk

@whistleUK

Public Interest Disclosure Act

www.dti.gov.uk/er/individual/pidguide-pl502.htm

Ofcom

www.ofcom.org.uk

Advertising Standards Authority

www.asa.org.uk