



ITV is committed to high standards of ethical corporate behaviour towards our colleagues and other stakeholders. This Policy sets out our commitments to encouraging and facilitating Speaking Up about concerns relating to malpractice or impropriety within, or involving ITV, or any of its companies.

The Policy sets out the channels via which you can Speak Up responsibly and effectively. ITV is committed to addressing promptly, fairly and confidentially, Speak Up concerns that are reported to us.

### WHO DOES THIS POLICY APPLY TO?

This Policy applies not only to employees of ITV, but also to any apprentices, individuals on work experience, agency workers, contractors, freelancers, shareholders, programme-makers, producers, programme participants, and any others acting on behalf of, or working with, ITV (agents, representatives, volunteers, suppliers). This Policy also applies to colleagues or relatives or other third parties connected with, or assisting, someone who is Speaking Up. References in this Policy to individuals raising a grievance in certain circumstances apply to ITV employees only. However, ITV operates a Freelancer Complaints Procedure which can be used by any freelancer who wants to raise any complaints regarding their own position (including any concerns around any alleged adverse treatment arising from making a disclosure under this Policy).

### WHY SHOULD I SPEAK UP?

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 is not about your own position but is about a risk to colleagues, clients, suppliers or ITV, it can be difficult to know what to do. 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 is only a suspicion. However, if something is troubling you that you think ITV should know about or look into, we would strongly encourage you to raise it at the earliest opportunity. If we don't know about it, we can't fix it.

Please remember that although you need to have a reasonable belief that malpractice has been, is being or is likely to be committed, you do not need to have firm evidence of malpractice to raise a concern.

### WHAT SHOULD I SPEAK UP ABOUT?

Although not an exhaustive list, Speak Up is intended to be used to raise concerns over:

- Malpractice, fraud, bribery or corruption
- Duty of care concerns
- Failure to comply with a legal, compliance or regulatory obligation (including breach of local broadcasting or advertising codes)

- Other criminal offences or illegal acts (including fraud)
- Miscarriage of justice
- Serious misuse or abuse of authority
- Concerns regarding widespread racism, discrimination or sexual harassment, potentially affecting multiple individuals
- Improper conduct or unethical behaviour or behaviours which are not in accordance with our values
- Child protection and safeguarding or modern slavery
- Accounting, auditing matters or financial reporting practices
- Breach of the Company's Code of Conduct or other Company policies
- Concealment of information relating to any of the above

## HOW DO I RAISE A CONCERN?

1. If you feel able to raise your concern openly with your line manager this is the best course. It may be possible to resolve your concern by discussing it with your line manager.
2. If you feel unable to raise the matter with your line manager or you think he or she has not properly addressed your concern, please raise it with a member of the [Senior Leadership Team](#), your [HR Business Partners](#), your local Managing Director (for international group companies), a Management Board member or one of the other [designated contacts](#).
3. If you are uncomfortable using the procedures outlined above, or where you believe that your concern has not been adequately addressed, please use our independent confidential Speaking Up facility, provided by an independent third party, Safecall. Information about how to Speak Up using this channel is provided at Appendix 2.
4. If you have followed the steps above but believe that the malpractice is continuing, or if the matter is so serious that it cannot be dealt with through these steps, please raise your concern with our nominated Plc Board director and Chair of ITV's Audit and Risk Committee: Margaret Ewing at 0777 031 8564.

## CONFIDENTIAL AND ANONYMOUS REPORTS

Concerns can be raised confidentially (where you provide your personal details) or anonymously (where you do not - see the 'Anonymity' assurance in the section below). All Speak Up concerns raised under this Policy are treated in confidence.

## OUR ASSURANCES

- **Confidentiality:** Your identity will be kept confidential. Your identity will not be disclosed to anyone beyond the authorised members of the designated Speaking Up team responsible for assessing and/or investigating the matter (see Appendix 3) without your consent, unless we are required to do so by law or to meet our regulatory or professional obligations.
- **Non-retaliation:** ITV will not tolerate any retaliation (including threats of retaliation) against an individual for raising a concern, making a report or assisting in an (internal or external) investigation. Anyone who knowingly conceals wrongdoing, or attempts to victimise, harass or deter a person raising a concern, will face appropriate action by ITV. This could result in summary dismissal in the case of ITV staff, termination of the relevant contractual relationship with ITV, or the matter being handed over to the appropriate authorities to investigate further. As an ITV employee, your job will not be put at risk as a direct result of you

Speaking Up. No-one raising a concern will be disadvantaged as a result of Speaking Up, whether the concern is proven or not, so long as the concern is genuine. Please raise any acts or threats of retaliation to your line manager or the [HR Director, Corporate Services](#).

- **Assessment and action:** 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. ITV will address all concerns appropriately and thoroughly. In some cases it may not be appropriate or possible for ITV to conduct an investigation itself, in which case alternative guidance may be given. Wherever possible, once the review, enquiry or investigation has been completed, feedback will be provided to the individual who raised the concern. (See Appendix 3)
- **Anonymity:** If you Speak Up through our Speaking Up provider, Safecall, and state you wish to remain anonymous, they will not disclose your identity to ITV. If you Speak Up through one of the other channels set out in this Policy, and ask the individual not to disclose your identity, they will not do so without your consent, unless required by law. If you Speak Up anonymously, you should understand that: (i) your identity may become apparent during the investigation of your concerns (and, in this case, our assurances as to confidentiality and non-retaliation set out above will apply); (ii) anonymity could limit ITV's ability to investigate your concern or (in cases where it cannot conduct an investigation) give alternative guidance; (iii) ITV could be unable to resolve a concern without revealing your identity (where known), for example where your personal evidence is essential, in which case we will liaise with you as to how best to proceed.
- **Individuals addressed in Speaking Up reports:** Where a Speaking Up report raises concerns about the conduct of an individual or individual(s), the identity of those individuals will be kept confidential. Their identity will not be disclosed to anyone beyond the authorised members of the designated Speaking Up team responsible for assessing and/or investigating the matter (see Appendix 3) without their consent, unless we are required to do so by law or to meet our regulatory or professional obligations.

#### YOU SHOULD NOT USE THIS POLICY TO:

- Report events presenting an **immediate threat to life or property**. Please use the specific ITV or your local emergency procedures instead.
- Report any **grievances or personal employment issues** you may have in relation to your terms of employment. These should normally be raised in line with the Bullying, Harassment and Grievance Procedures appropriate to your area of the Group.
- Settle **personal or legal disputes**.
- Make **accusations which you know are false**. Doing so may lead to disciplinary measures.
- Make any complaints or comments regarding **ITV's programmes**. This should be done via Viewer Services ([viewerservices@itv.com](mailto:viewerservices@itv.com)). The team can also be contacted via telephone on 0344 88 14150 (option four).
- Report any day-to-day **issues regarding ITV facilities or workspaces**. This should be done by contacting [workplaceserviceshelpdesk@itv.com](mailto:workplaceserviceshelpdesk@itv.com).

ITV's usual health and safety incident reporting channels should be used for reporting specific **health and safety incidents**. ITV's procedures require health and safety incidents to be reported through the Health and Safety team or the reporting tool, airsweb AVA. For more information please refer to the airsweb AVA page on [my.itv](#) and [Compass.itv](#). However, if you have serious concerns that the health or safety of any individual has been or

may be endangered, or you believe that reports you made through usual health and safety incident reporting channels have not been addressed, you are encouraged to raise a Speak Up concern under this policy.

ITV encourages you to report concerns regarding ITV's **third-party suppliers** under this Policy. However please note that in respect of concerns relating to activity taking place wholly within a third-party supplier, where ITV does not have access to information and records, it is unlikely that ITV would be able to conduct a proper investigation itself. ITV will however look to pass the complaint on to the third party as appropriate or may consider whether it needs to take action with the supplier.

## **GUIDANCE FOR MANAGERS**

- Managers are expected to listen to, acknowledge and support anyone who raises a concern and to promote a working environment that supports Speaking Up without fear of reprisal.
- It is important that concerns raised with you are dealt with sensitively and confidentially, and that concerns are escalated in accordance with this Policy so that they can be acted on as appropriate. Managers should be familiar with this Policy. If as a manager you need further guidance on how to escalate or deal with a concern raised with you, including those raised on an anonymous or 'no names' basis, you should refer to the Guidance for managers.

## **POLICY OWNER AND OVERSIGHT**

The Audit and Risk Committee reviews arrangements by which individuals may, in confidence, raise concerns about possible inappropriate activity as detailed in this Policy. The Committee also reviews concerns raised through the Policy to make sure that any significant matters receive independent investigation and appropriate follow up action. The Group Secretariat team reports information on concerns raised and investigation results to the Audit and Risk Committee at least twice a year. The identity of individuals raising concerns is not reported.

Group Secretariat has day-to-day operational responsibility for this Policy and will review this Policy from a legal and operational perspective at least once a year.

## APPENDIX 1 - OTHER AVAILABLE RESOURCES

ITV is committed to good governance and fully endorses the principle of accountability. Although you do not need to raise your concerns with ITV before contacting an external party, we would encourage any concerns to be raised with ITV first. 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 (see further below).

You may also seek advice from your union if you are a member, or should you prefer from your own lawyer. You may do this before, at the same time as, or after you have raised your concerns internally.

There are also resources available to you to provide you with support and counselling if needed.

Other contacts are set out below:

- **The ITV Ambassadors network and the Chairs of ITV's colleague networks** can be a useful, confidential sounding board and provide advice on how to raise your concern through the channels in the main part of the Policy.
- **Protect** provide confidential advice to workers who are unsure of whether or how to raise a public interest concern. Please note that they will not be able to raise a concern to ITV on your behalf. For whistleblowing advice you can call them on 020 3117 2520. Further information about the services they provide can be found on their [website](#).
- The **Employee Assistance Programme** is a service provided by Workplace Wellness, an independent organisation that can provide independent and confidential guidance and support for personal and work-related issues 24/7 for all ITV colleagues. For advice you can call them on 0800 1116 387 (free from a UK landline) or log into our online <http://my-eap.com/login>, with the username itvwell
- **Togetherall** (previously known as Big White Wall) offers free online mental health support to all ITV colleagues 24/7. It has an active discussion forum where you can talk anonymously to other members, with round-the-clock support from trained professionals. You can also access a wealth of useful resources and work through tailored self-help courses covering topics such as anxiety, sleep, depression and many more. You can sign up [here](#) using any email address.

### UK - SPECIFIC

- **The Film & TV Charity** specialise in providing support to people with two or more years' experience working in film and television, covering a wide range of issues, including bullying and harassment, legal advice and debt. Their helpline number is **0800 054 0000**. Further information on the charity, including other ways to contact them, can be found on their [website](#).
- **Acas** (Advisory, Conciliation and Arbitration Service) is an independent and impartial organisation providing information, advice, training, conciliation and other services for employers and employees to help prevent or resolve workplace problems. Acas can be contacted on their free confidential helpline: 0300 123 1100. Advice on bullying and harassment can be found on their [website](#).
- **The Equality & Human Rights Commission** is an independent statutory body with the responsibility to encourage equality and diversity, eliminate unlawful discrimination, and protect and promote the human rights of everyone in Britain. You can find guidance on discrimination and human rights on their [website](#).

- **Ofcom:** UK whistleblowing legislation specifies that for whistleblowings related to broadcasting, a disclosure can be made to Ofcom, who regulates the media sector. Further information can be found on their [website](#).

## APPENDIX 2 - HOW DO I CONTACT SAFECALL?

There are two ways in which you can contact Safecall:

- **By phone:** Safecall’s phone lines are available 24 hours a day, 7 days a week. You will speak directly with one of Safecall’s call handlers. If you feel more comfortable reporting your concern in a language other than English, an interpreter will join the call to translate between you and the call handler.

Safecall can be contacted on the following freephone numbers:

<b>UK</b>	0800 9151571
<b>Australia</b>	1800 312928
<b>Denmark</b>	00 800 72332255
<b>Fiji</b>	+44 191 516 7782
<b>Finland</b>	990 800 72332255 (Telia)
<b>Finland</b>	999 800 72332255 (Elisa)
<b>France</b>	00 800 72332255
<b>Germany</b>	00 800 72332255
<b>Hong Kong</b>	3077 5524
<b>India</b>	000 800 4401256
<b>Israel</b>	012 800 72332255 (Golden Lines)
<b>Israel</b>	013 800 72332255 (Barak)
<b>Israel</b>	014 800 72332255 (Bezeq)
<b>Italy</b>	00 800 72332255
<b>Lebanon</b>	+44 191 516 7756
<b>Netherlands</b>	00 800 72332255
<b>Norway</b>	00 800 7233 2255
<b>Singapore</b>	800 4481773
<b>Spain</b>	00 800 72332255
<b>Sweden</b>	0850 252 122
<b>UAE</b>	8000 4413376
<b>USA</b>	1 866 901 3295

- **Via Safecall’s website:** Reports can also be made using Safecall’s secure website, which supports over 60 languages: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Please ensure that you quote ‘ITV’ as the company name in your communications with Safecall, so that your concerns can be correctly escalated.

When you contact Safecall, they will ask you to provide your name, contact details, your position and where you work. If you are comfortable to provide these details, please do so. If you are comfortable to provide these details, but would prefer that they are not shared with ITV, please let Safecall know. If you prefer to remain anonymous, please let Safecall know.

Safecall will then ask you to talk through your concern. Calls are not recorded; the call handler will take handwritten notes and write up a report after the call. You will be given a user name and password which will allow you to log onto Safecall's secure website to continue to communicate. You will also be asked to provide a memorable word, which will be used to verify your identity should you call Safecall again in connection with the same concern.

No counselling or advice will be given to you by Safecall. Safecall will refer your concern to ITV's designated Speaking Up Team. Safecall does not filter, grade, or verify the content of communications, and makes no value judgement on the content of the communication.

Communications to Safecall are treated on a strictly confidential basis.

### APPENDIX 3 – HOW ITV WILL HANDLE SPEAKING UP CONCERNS

Once you have raised your concern, ITV will assess it and consider: (i) which internal team should handle it; and (ii) what action is appropriate. This may involve an informal review, an internal enquiry or a more formal investigation. We aim to acknowledge your concern within seven days of receipt. Either at that time, or shortly thereafter, you will be told who will be handling your concern, 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. In any event, we will provide an update within three months of receipt of your concern.

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, or other ITV 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 we will respond to all matters in the way that every colleague might wish, we will try to handle any such concern fairly and appropriately, taking into account our responsibilities to the colleague who Speaks Up and any colleagues against whom a concern is raised.

## APPENDIX 4 – COUNTRY SPECIFIC REFERENCES

### AUSTRALIA

Certain disclosures under this policy qualify for protections under Australian law, including under the *Corporations Act 2001* (Cth) (the **Act**) (**Relevant Disclosures**). These include:

1. identity protection (confidentiality);
2. protection from detrimental acts or omissions;
3. compensation and remedies; and
4. civil, criminal and administrative liability protection.

#### **Identity Protection**

ITV cannot disclose your identity or information that is likely to lead to you being identified, except where there is a specific exception under the Act. If there is a breach of confidentiality you can use the procedure under this policy to lodge a complaint. You may also lodge a complaint in relation to a Relevant Disclosure with a regulator, such as ASIC, APRA or the ATO, for investigation.

#### **Protection from detrimental acts or omissions**

ITV cannot engage in conduct that causes detriment to you in relation to the disclosure if:

1. ITV believes or suspects that you made, may have made, propose to make or could make a disclosure that is protected; and
2. Our belief or suspicion is the reason, or part of the reason, for the conduct.

#### **Compensation and other remedies**

You can seek compensation or other remedies through the courts if you suffer loss, damage or injury because of the Relevant Disclosure and ITV failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

#### **Civil, criminal and administrative liability protection**

You are protected from any of the following in relation to your Relevant Disclosure:

1. civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
2. criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and

3. administrative liability (e.g. disciplinary action for making the disclosure).

However, this protection does not grant you immunity for any misconduct you have engaged in that is revealed in your disclosure.

### **Anonymity**

These protections are available whether the disclosures are made anonymously or otherwise. You may choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised. You may also refuse to answer questions that you feel could reveal your identity at any time, including during follow-up conversations. If you wish to remain anonymous you should maintain ongoing two-way communication with ITV so that we can ask follow-up questions or provide feedback.

Some ways that you may choose to remain anonymous include communicating through Safecall or using an anonymised email address. You may also adopt a pseudonym for the purpose of your disclosures.

### **Legal Practitioner Disclosures**

Where you have made Relevant Disclosures to a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to whistleblower protections, these disclosures are protected under the Act, even where a legal practitioner concludes that the disclosures you are making are not “disclosable matters” under the Act.

## **FINLAND, GERMANY, ISRAEL, ITALY, NETHERLANDS, SWEDEN, NORWAY**

No specific additional guidance to the main Policy, or additional legal requirements to highlight.

## **FRANCE**

Under French law, the SAPIN II” law no 2016-1691 of December 9<sup>th</sup>, 2016 (**SAPIN II**) regulates whistleblowing systems, and defines a ‘whistleblower’ and relevant disclosures (e.g. a crime/offence, a serious threat or prejudice to general interest) that fall under the scope of this law. Under SAPIN II, if a whistleblower (as defined therein) does not receive an update on the disclosure he/she has made within three months of disclosing this under the Policy, he/she is entitled to contact the French judicial or administrative authorities. If the relevant concern is not taken into account by French judicial or administrative authorities within three months of notifying them, the whistleblower is entitled to make the relevant disclosure public.

Please contact [Marine Lebegue](#) if you have any queries regarding your whistleblower rights under French law.

ITV will inform the people raising the concern of the outcome of the investigation (to the extent possible) within two months of concluding the investigation.

French external resources:

### **AFA (agence française anti-corruption)**

Par mail : [afa@afa.gouv.fr](mailto:afa@afa.gouv.fr) ou pour les demandes liées à l’international : [international@afa.gouv.fr](mailto:international@afa.gouv.fr)

Par courrier : 23 avenue d’Italie, 75013, Paris

Par téléphone : 01.44.87.21.24 / 01.44.87.21.68

**Défenseur des droits**

<https://www.defenseurdesdroits.fr/fr/obtenir-des-reponses>

Par téléphone; 09.69.39.00.00

**Maison de la justice et du droit**

<https://www.paris.fr/equipements/maison-de-la-justice-et-du-droit-secteur-paris-nord-est-m-j-d-1219>

Tél. : 01 53 38 62 80

Courriel : [mjd-paris-nord-est@justice.fr](mailto:mjd-paris-nord-est@justice.fr)

**UNITED STATES**

Any concern raised by a third party based in the US or by a US colleague, through the Safecall mechanisms or via any of the other avenues set out in the policy, must then be notified to both [Jenise Caiola](#) and [Heath Banks](#). Please note that the assurances set out in this Policy, including in relation to confidentiality (and anonymity if requested) will apply to any onward notification to these individuals.