

WHISTLE-BLOWING POLICY & PROCEDURE



This procedure is endorsed by the Company's Senior Management Team and will be reviewed regularly. This procedure may be changed from time to time, and you will be informed of any such changes. This policy is non contractual.

Shrewsbury Town Football Club and Shrewsbury Town Community Programme (STFC) supports the highest standards in corporate governance. Our aim is to promote outstanding governance by assuring our employees of our commitment to quality, openness, accountability and integrity.

As part of our commitment to these high standards, this statement is intended to support and encourage employees or others with serious concerns or information, relating to questionable practices, to do the right thing and come forward and express those concerns. We recognise that employees may need to come forward on a confidential basis. We want to make it clear that they can do so without fear of victimisation.

The purpose of introducing this Whistleblowing Policy is to encourage employees to raise any serious concerns by "blowing the whistle" within the Company, rather than disregarding a problem or raising the issue externally. The policy is not intended to be used for the pursuance of grievances about a personal situation, as the Company already has policies and procedures in place for this purpose.

GENERAL PRINCIPLES

- Concerns should only be raised in good faith and should not be raised to further a personal grievance or private dispute (where appropriate, such matters should be dealt with through our grievance procedure);
- Victimising employees who make a disclosure or deterring them from raising a genuine concern about fraud, corruption, malpractice or unethical conduct will constitute a serious disciplinary offence;
- Abuse of this procedure by maliciously or mischievously raising unfounded allegations, either internally or externally, will be regarded as a serious disciplinary offence;
- Where an allegation is made, the person or persons against whom the allegation is made shall be informed of the allegation and the evidence supporting it, and shall be allowed to comment before the investigation is completed;
- Any allegation of malpractice shall be treated in the strictest confidence and investigated immediately. The identity of the individual raising the complaint shall not be disclosed to the alleged perpetrator of malpractice without that individual's prior approval, unless this is incompatible with a fair investigation. You will be informed of the need to disclose your identity in any event;
- Any disclosure made under this Policy must be in good faith. If you make an allegation, you must have a reasonable belief that the allegation is true, and it must not be made for personal gain



The Public Interest Disclosure Act 1998 (which came into force in January 1999) was enacted to enable employees to raise their concerns. It gives legal protection to those who honestly and reasonably believe that the information they disclose or the allegations they make are substantially true. In addition, The Company's (Audit, Investigations and Community Enterprise) Act 2004 (effective from April 2005) introduced key changes in respect of the disclosure of information by directors and employees to company auditors. Employees are encouraged to consult the confidential fraud line if they are concerned about the accuracy or scope of information provided to auditors by themselves or by a co-worker.

PROCEDURE

STFC understands that it is never easy for an employee to report their concern, particularly one which may relate to corruption, dishonesty, health and safety or environmental issues. Employees are urged to come forward with any concerns at the earliest opportunity to prevent any situation from worsening. Any concerns should be raised with the HR Manager.

If the allegations relate to a matter which you could raise as a grievance, you may, if you wish, raise them as a grievance following the statutory grievance procedure. Alternatively, you should follow the procedure below.

This procedure applies to the following allegations:

- that a criminal offence has been, is being, or is likely to be committed;
- that a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject;
- that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- that the health and safety of any individual has been, is being, or is likely to be endangered. · that the environment has been, is being, or is likely to be damaged;
- that information tending to show any matter falling within one of the above categories has been, is being, or is likely to be deliberately concealed.

If you wish to raise concerns you can write or speak to the club secretary or report on My Concern. If your concern is about the Chief Executive Officer/Foundation Director/ Finance Director or if you believe that the issue can only be addressed by the Directors, you should speak to the Chairman.

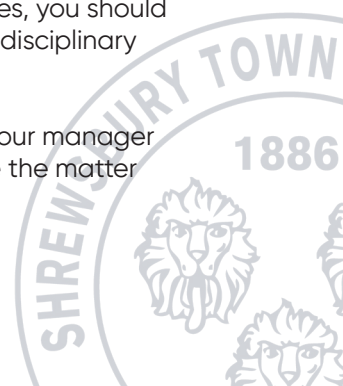
In the first instance, you should make any allegation covered by this procedure in writing to the Club Secretary or on the my concern app

A record will be made of receipt of the disclosure and we will either investigate the disclosure or arrange for an appropriate member of the Senior Management Team to do so.

Once the investigation is completed, we will inform you, subject to any third party rights, of the outcome of the investigation.

If you have any concerns or complaints about the manner in which you feel you are being treated because you made the disclosure, whether by the alleged wrongdoer or by any colleagues, you should raise this with a member of the Senior Management Team, and it may be dealt with as a disciplinary matter in relation to such individuals.

If you are dissatisfied with the outcome of the investigation or feel unable to report it to your manager in the first instance, disclosure should be made in writing to the Board who will investigate the matter and report back to the individual. The decision of the Board will be final.



SAFEGUARDING

If the allegation is regarding safeguarding concern, it may result in a referral to the Football Association (FA) and Local Authority Designated Officer (LADO).

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