



# Whistleblowing Policy and Procedures

LOKR Sports Ltd

Last updated: 28 April 2026

## Document Control

**Policy Owner:** Operations Director

**Approval Date:** 08/08/2024 \ **Effective Date:** 08/08/2024 \ **Review Date:** October 2026

**Note:** This policy must be reviewed annually or when significant changes occur to ensure its continued relevance and effectiveness.

- **08/08/2024** (v1.0, Adam Wood) Create formalised Whistleblowing Policy and Procedures document.
- **10/08/2025** (v1.1, Claire Robinson) Annual Review
- **08/10/2025** (v1.2, Claire Robinson) Updates for LOKR

## 1. Introduction

Whistleblowing is the term used when you report something you see or have found out about that you consider to be wrong. In most cases this can be reported to the Operations Director. If you cannot or do not wish to do this for any reason, then you should follow the procedure set out below.

## 2. Scope

This Policy applies to all employees, subcontractors, and agents working with LOKR, including those employed on a permanent, temporary, part-time, or casual basis. It also applies to all applicants for employment, volunteers, and interns.

## 3. Policy Statement

LOKR is committed to ensuring an open culture with the highest standards of honesty and accountability. This policy is designed to allow any employees to disclose information that they believe constitutes a wrongdoing, without being penalised in any way for doing so.

## 4. Procedures

LOKR recognises that raising concerns about wrongdoings can be one of the most difficult and challenging things to do in a work environment. Under this policy you may come forward with legitimate concerns without fear of being blamed or of any reprisal. You will not be disadvantaged for raising what you consider to be a legitimate concern.

### 4.1 What wrongdoings should be raised?

If you genuinely believe that we, or any of our staff have taken, are intending to take or have failed to take action that you reasonably believe could lead or amount to:

- a failure to comply with any legal obligations
- a criminal offence that has been, is being or is likely to be committed

• unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and/or sensitive information

- a miscarriage of justice

- bribery or financial fraud
- risk or damage to the environment
- a danger to the health and safety of employees or others
- attempts to suppress or hide information or evidence relating to

wrongdoing in any of the areas above

The Public Interest Disclosure Act 1998 provides protection for workers who reasonably believe that they are acting in the public interest, where the concern (disclosure) is covered under one of the areas above. The concern can be about an incident that happened in the recent past, is happening now or that you believe it is likely to happen in the near future. Concerns over personal issues, such as a complaint against another staff member or independent practitioner, should be raised using the appropriate company procedure, likely to be either the Grievance Policy, Bullying and Harassment Policy or the Code of Business Conduct, as such complaints are not in the public interest.

## 4.2 Can I raise a concern anonymously?

Anonymous reporting is discouraged as it may prevent us obtaining further information in relation to the concern raised and prevent a full investigation from taking place. You can make a protected disclosure where we will assure you of confidentiality unless we are required to disclose your identity by law.

## 4.3 How do I raise a concern?

If possible, you should raise your concern internally. This can be reported verbally or in writing to any manager or director within the Company. We advise that you contact the Director of Operations in the first instance. You should provide as much detail as possible, including anything you have witnessed, any evidence you have obtained and the dates and times of incidents occurring, as appropriate. If you attend a meeting, you can bring a companion with you, if you wish, for moral support.

If you really feel you are unable to raise your concern internally you may make a disclosure to a relevant regulatory authority. This information will be available publicly from the Company. The matter will be fully investigated with you, and with other people that you believe are involved with or connected to the suspected wrongdoing, by an appointed independent investigating officer who may be internal or external to the Company.

## 4.4 What will happen next?

The person you have raised the concern with will listen to you and consider the concern(s) you have raised and decide what, or if, further action is needed. You will be informed who else may need to be spoken to. Generally, the Directors of the organisation will need to be informed, and they will consider any actions to be taken.

Where possible you will be kept informed about the actions which are proposed or are being taken. This may not always be possible where we are under a duty to protect the confidentiality of any other people that are involved.

If you do not feel your concern has been dealt with appropriately you may address any concerns you have about the way the matter has been dealt with.

## 4.5 Giving you support

It is understandable that staff may feel that they will be singled out for making a disclosure that they believe to be of public interest. We will take every step to ensure that if you raise legitimate concern, you will be protected and supported. We may take appropriate action against any person found to be:

- victimising another person for using this procedure (please tell a member of the management team if you think you have been victimised, or raise it formally under the grievance procedure if the matter is not remedied).
- deterring any person from reporting genuine concerns under this

procedure. If you think you have been deterred, you can raise the matter formally under the grievance procedure (if the matter is not remedied).

If we find that people have done either of the above, we may take disciplinary action against them, which may result in their dismissal. If we find that you have raised a concern in a frivolous or vexatious manner then our investigation may potentially result in us taking disciplinary action against you, which may lead to your dismissal.

## 4.6 Status of this policy

This policy does not give contractual rights to any member of staff. The Company reserves the right to make amendments to or change the content of the policy at any time. Any changes will be communicated to all workers.

## 4.7 Monitoring

Monitoring of incidents raised under this policy will be via a Whistleblowing Incident Log. This will be reviewed on a monthly basis.

## 4.8 Legislation and Guidance

- Public Interest Disclosure Act 1998
- Government Guidance: [Whistleblowing guidance and code of practice

for employers](<https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-ofpractice-for-employers>)

## 5. Enforcement:

All employees, contractors, and suppliers are expected to comply with this policy. Non-compliance may result in disciplinary action or termination of contracts, depending on the nature and severity of the breach. Persistent or deliberate breaches may be escalated to the Board for further action. LOKR reserves the right to audit compliance and require corrective measures where deficiencies are identified.

## 6. Review

All policies are reviewed on an annual basis automatically. Additional specific criteria for review include:

- Changes to local or national policy or service provision or legislation
- Incidents prompting policy review (e.g., where policy was not followed, or proved inadequate)