



Whistleblowing Policy

Talent Boutique Solutions Ltd

July 2025

1. Introduction

Talent Boutique Solutions Ltd ("the Company") is committed to the highest standards of openness, integrity, and accountability. We encourage all individuals to report concerns about wrongdoing or improper conduct at work. This policy supports our legal obligations under the Employment Rights Act 1996 (as amended) and the Public Interest Disclosure Act 1998 (PIDA). The policy applies to all employees (full-time, part-time, fixed-term), contractors, agency workers, consultants, and any third party interacting with the Company. This policy is non-contractual and subject to periodic review and amendment by the Company.

2. Policy Principles

- Everyone is responsible for reporting wrongdoing.
- Reports will be treated seriously, fairly, and promptly.
- Confidentiality will be maintained wherever possible.
- No individual will suffer detriment, victimisation, or retaliation for raising a genuine concern. Retaliation is a disciplinary offence.
- False or malicious allegations may result in disciplinary action.
- Individuals are encouraged to speak up even if they do not have proof - a reasonable belief is sufficient.
- No one should be instructed to cover up wrongdoing; such instructions must be refused and reported.

3. Scope of Whistleblowing

A "qualifying disclosure" refers to concerns about:

- Criminal offences
- Miscarriages of justice
- Risks to health and safety
- Financial fraud or mismanagement
- Breaches of data protection or information security
- Harassment, discrimination, or bullying
- Environmental damage
- Breaches of internal policies or legal obligations
- Conduct damaging to the Company's reputation
- Breaches of diversity, equity, and inclusion commitments
- Attempts to conceal any of the above

4. Reporting Process

4.1 How to Report

- Primary Contact: Your Line Manager
- Alternative Contact: If you believe your Line Manager is involved or you are uncomfortable reporting to them, contact the Managing Director (currently Patrycja Malara).
- Anonymous Reports: May be made via the secure whistleblowing email: [insert secure email address], or by calling the confidential hotline on [insert hotline number].

4.2 Investigation Process

- Concerns will be acknowledged within 5 working days.
- An impartial investigation will begin as soon as practicable.
- Where required, statements will be taken and evidence reviewed.
- The whistleblower will be updated on progress at least every 2 weeks.
- On conclusion, the Company will explain what action has been taken or why no action is needed.

4.3 Escalation

If you reasonably believe that the matter was not properly investigated, or appropriate action has not been taken you may escalate directly to the Managing Director, or if still dissatisfied, to a prescribed external authority, including but not limited to:

- HM Revenue & Customs
- Financial Conduct Authority
- Competition and Markets Authority
- Health and Safety Executive
- Information Commissioner's Office
- Police

5. Protection and Support

- Whistleblowers will not be victimised or dismissed for making a qualifying disclosure.
- Any retaliation against a whistleblower will be treated as a serious disciplinary matter.
- Support is available through the Employee Assistance Programme (EAP) or HR for those who experience stress or anxiety related to whistleblowing.

6. Review

This policy will be reviewed annually to ensure it meets current legal standards and best practice.