

POLICY

Public interest disclosure (Whistle Blowing)



What is this policy about?

We have adopted this policy in order to implement the Public Interest Disclosure Act 1998 (PIDA), which came into force in July 1999, and is now being formalised further to the requirements of the Combined Code on Corporate Governance and the UK Anti Bribery and Corruption Act 2010. Collectively these are designed to enable you to report misconduct or malpractice or other disclosures and to offer you protection against recrimination, victimisation or harassment. This is commonly referred to as “whistle blowing”. We have also developed a procedure (see “what should I do if I have concerns”), which should be followed should you wish to make any disclosure.

Who does this policy cover?

We have placed you and your colleagues in positions of trust and expect you to demonstrate high levels of integrity in carrying out your responsibilities. Similarly, our customers expect to be dealt with fairly and honestly in their dealings with William Hill. Misconduct or malpractice breach this trust and endanger our reputation and business. The best way of protecting the business and its reputation is for those who have genuine suspicions about wrongdoing to be able to report their concerns in a safe environment without fear of reprisal or victimisation.

Any report made will be listened to, investigated and treated in confidence.

Victimisation of anyone who comes forward to disclose a reasonable suspicion will not be tolerated and will be considered a serious disciplinary matter.

This policy seeks to explain what steps you should take if you wish to disclose actual or planned misconduct, fraud or other malpractice including (but not limited to):

- Any unlawful act, whether a criminal offence or a breach of civil law;
- Failure to comply with any legal obligation to which the Group is subject;
- Breach of any statutory code of practice;
- Miscarriage of justice;
- Breach of, or failure to implement or comply with, any William Hill policy adopted and approved by the Board;
- Corruption or fraud;
- Actions likely to cause physical danger to any employees or member of the public, or likely to give rise to a risk of significant damage to property;
- Danger to the health and safety of any individual;
- Environmental damage; and
- Information tending to show any matter falling within any one of the preceding possible disclosures has been deliberately concealed.

This policy has not been created to deal with grievances or personal difficulties, for which separate procedures and arrangements are in place.

What should I do if I have concerns?

If you have a reasonable belief that one or more of the above examples of misconduct or malpractice has occurred or may occur, then it is your responsibility to come forward and explain these. You do not have to be absolutely sure. It may simply be a mistake in the system or process, rather than a deliberate wrongdoing, and therefore you must exercise your judgment and common sense. In any event, do not leave matters until it is too late. If you fail to report, unreasonably in the Group's view given all the related circumstances, any wrongdoing or serious suspicion of wrongdoing that you believe has happened, we will regard such a failure as a serious disciplinary matter.

If you can, you should speak to your Manager in the first instance. However, we accept that there will be certain circumstances when you will feel uncomfortable doing this. In these circumstances, we have an arrangement with an independent third party, Navex Global to provide every William Hill employee with access to a confidential "free to call" or "online reporting" service to enable you and your colleagues to report concerns with confidence. A list of their country specific telephone numbers and URL to the web reporting form can be found at Appendix 1 of this policy document.

Disclosure

An allegation of wrongdoing is a serious matter. It may involve an extensive and possibly expensive investigation. The person or persons implicated may be seriously affected. It is important that as much information as possible is disclosed to the Head of Internal Audit. The disclosure can be made verbally and/or in writing. As a minimum, however, it should contain the following:

- An indication of the nature and extent of the wrongdoing;
- The source or sources of the employee's knowledge or the basis of his/her suspicions; and
- The identities of the person or persons implicated; and any evidence to support the assertions made.

Colleagues who raise concerns via the independent whistleblowing service will not suffer any detriment for doing so.

Confidentiality

Navex Global is a completely independent organisation. You can phone in anonymously and with total confidence that your call will not be traced or recorded. Information given to Navex Global will be passed on to William Hill Internal Audit who will act on it without compromising you in any way. You can contact Navex Global on the free phone number; seven days a week, 24 hours a day (see Appendix 1 for details). Navex Global provide a report key, allowing reporters to follow up on an existing report.

Full details of how your personal information is used when you use our independent whistleblowing service are detailed in Appendix 2 at the end of this policy.

The Designated Officer

The role of the Designated Officer (the Head of Internal Audit) is to make a preliminary assessment of the information disclosed and to determine whether that information establishes that:

- A formal investigation is required;
- Reference to one of the Group's established disciplinary procedures is justified as a proper alternative to a full investigation;
- An immediate reference to an outside body (for example, the Police) is justified, taking into account the seriousness of any evidence disclosed; or
- No investigation is necessary.

The Head of Internal Audit will be entitled to discuss the matter with senior employees where appropriate and/or obtain independent external legal, accountancy, forensic or other professional advice to assist in the preliminary assessment and the investigation of the information disclosed.

Navex Global (via the Head of Internal Audit) or the Manager, to whom the suspicion was reported, will give you feedback on the outcome of the preliminary assessment and the investigation within 21 days. Any investigation may take time to fully complete, but you will be told in due course whether the suspicions were well-founded and, where appropriate, what action has been taken by the Group.

If you are dissatisfied with the outcome of the investigation, you may either request that the Head of Internal Audit review the information disclosed taking into account any fresh evidence or disclose the information to an appropriate external authority.

Investigation

If the Head of Internal Audit determines that a full investigation is warranted, it will be performed by an Investigation Team. The Investigation Team will be selected by the Head of Internal Audit and will consist of employees with sufficient skills and experience to deal with the information disclosed. The Investigation Team will set its own timetable and procedure, and will be entitled to obtain external professional advice or assistance wherever necessary.

The Investigation Team will produce a written report of its findings, which will be approved by the Director of Internal Audit and other Senior Managers at the Head of Internal Audit's discretion. The report will be circulated at the Director of Internal Audit's discretion.

If the Investigation Team finds that the information disclosed does not establish a case against the person or persons concerned, no further action will be taken. If the Investigation Team finds that the disclosure was motivated by malice or was made recklessly without proper regard for the truth, it may recommend formal disciplinary action against you as the disclosing employee. If the Investigation Team finds that the case is established, it will make a recommendation for action by the Group, which will include, but not necessarily be limited to:

- Bringing action against the person or persons concerned under the Group's disciplinary procedures; or
- Contacting, on a confidential basis, an appropriate external body for further investigation or decision. The external body may be the Police, the Health & Safety Executive, the Inland Revenue, Customs & Excise or another appropriate body.

Disclosing information to an External Authority

We recognise, in accordance with PIDA, that you may consider that reference to an external authority may be justified even if an Investigation Team decides there is no case to answer or if the information to be disclosed is of such importance that immediate reference to an external authority would be appropriate in any event. In either of these cases (but particularly if immediate disclosure is thought to be justified), you must be satisfied that:

- You are making the disclosure in good faith and not for any personal gain;
- You reasonably believe the information to be substantially true;
- It is reasonable to disclose the information to an external source; and
- You reasonably believe that no alternative is available because of a general fear of personal detriment, concealment or destruction of evidence by your employer or because previous disclosure to your employer of the same information has been made without result.

Where the normal reporting procedure is not followed because the information is considered exceptionally serious, you must be satisfied that that is indeed the case.

You must understand that avoidance of the normal reporting procedure when these conditions cannot be satisfied may leave you open to legal action by the person or persons wrongly and unjustifiably implicated, and/or leave you subject to the Group's disciplinary procedures.

You can also refer to the Company's policies relating to:

- Anti-Corruption and Bribery

Appendix 1

Navex Global International free phone numbers (updated December 2020)

COUNTRY	FREE PHONE ACTIVE	FREE PHONE NUMBER
UK	Yes	0808 196 5756
Bulgaria	Yes	0800 46 226
Italy	Yes	800 729 261
Malta	Yes	8006-2784
Philippines	Yes	1800-1-322-0315
Poland	Yes	800-005-056
Spain	Yes	900-999-313
Sweden	Yes	020-10 93 95
United States	Yes	8449130979
Gibraltar	Yes	8800 At the English prompt dial 8449130979.
Latvia	Yes	80 005 735
Denmark	Yes	80 83 02 32
Columbia	Yes	01-800-5190378
Argentina	Yes	0800-345-8187

Online reporting via williamhill.navexone.eu

Should you have any further questions please contact GO2HR on GO2HR@williamhill.co.uk

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Owner Human Resources

Appendix 2 Privacy Statement

This notice describes how your personal information is used when you use our independent whistleblowing service.

The data controller for the whistleblowing information is NAVEX Global, Inc. ("NAVEX") contact details of their Data Protection Officer (DPO):

Attention: Data Protection Officer

5500 Meadows Road, Suite 500

Lake Oswego, OR 97035 USA

privacy@navexglobal.com

The categories of personal data we collect are:

- Information about the whistleblowing activity
- Names

You do not have to provide your name when using the service, you can report anonymously. NAVEX will process your personal data for the below purposes:

- Collecting information relating to a whistleblowing incident
- Investigating a whistleblowing claim
- Providing anonymous information to William Hill to complete whistleblowing investigations

NAVEX perform these services under contract with William Hill. The legal basis to process this information is: Public Interest – preventing and detecting unlawful acts or where you have consented for your information to be processed. If you have consented to your data being processed

William Hill Organization Ltd is also a data controller of the information that is provided by NAVEX you can contact the William Hill DPO on: dataprotection@williamhill.com

William Hill will use the information provided to investigate whistleblowing activities brought to the attention of the company.

Data Sharing

NAVEX will share the whistleblowing information with William Hill. Depending on the nature of the whistleblowing incident, William Hill could share the information with law enforcement or regulatory agencies.

Retention

We will retain your information for the necessary period of time that it serves the purpose for which it was originally collected or subsequently authorized and in accordance with applicable law. For example, we will retain your information for as long as your account is active, as necessary to comply with our legal obligations and rights, to resolve disputes, and to enforce our agreements."

Your rights

You have the rights to:

- Information about how your data is being used
- Access the information we process about you
- Erasure of the information we process about you
- Rectification of the information we process about you
- Restrict the processing of your data
- Object to our use of your data
- Data portability
- Lodge a complaint with a data protection regulator / "supervisory authority"

We do not conduct any automated decision making or profiling on your personal data.

You do not have to provide us with personal data but it may impact the quality of the whistleblowing if you do not provide information that is needed to complete a full investigation.