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# Whistleblowing Policy

Version 2.4

30/10/24



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# 1. Introduction

We are committed to conducting our business with honesty and integrity and in an ethical manner and we expect everyone working on our behalf to do the same.

This policy applies to anyone working for Zen or on our behalf in any capacity, including but not limited to our Board of Directors, the Executive Committee, employees, external consultants, interns, agency workers, third party representatives, volunteers, suppliers and business partners.

## 2. What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our business and activities. Generally, this could be a breach of a legal, statutory or regulatory requirement; or unethical, immoral or illegal activity or behaviour. This includes bribery, corruption, modern slavery, facilitation of tax evasion, fraud or other criminal activity, sexual harassment, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Please see Protect's website for further information, including guidance on when to blow the whistle versus when to raise an internal grievance. Whistleblowing or grievance? | Protect - Speak up stop harm ([protect-advice.org.uk](https://protect-advice.org.uk))

## 3. How to raise a concern

If you suspect that any illegal or unethical practice has occurred or may occur, you must notify Zen as soon as possible by emailing [legal@zeninternet.co.uk](mailto:legal@zeninternet.co.uk).

In some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator.

## 4. Protection and support for whistleblowers

We encourage openness and will support anyone who raises genuine concerns under this policy, even if it turns out to be mistaken.

Zen will not threaten or retaliate against whistleblowers in any way.

## 5. External whistleblowing contacts

### Protect

(Independent whistleblowing charity) for further information, including guidance on when to blow the whistle versus when to raise an internal grievance.

- [Whistleblowing or grievance? | Protect-Speak up stop harm](#)
- Helpline: **0203 117 2520**
- [Web form: Contact the Advice Line - Protect - Speak up stop harm](#)
- [Website: Protect - Speak up stop harm](#)

### Unseen

(UK Government's Modern Slavery Helpline)

Helpline: 0800 0121 700

Website: [Modern Slavery Helpline](#)

## 6. Document review

This document will be reviewed on an annual basis and will be signed off by Zen's Board of Directors. We reserve the right to amend this policy at any time.



## 7. Version Control

Version Number	Date	Change	Author	Approver
1.0	01/06/20	Published	D McEvoy	M Kay
2.0	10/08/22	Redrafted and added modern slavery helpline	P Wilson	M Kay
2.1	02/12/22	Changed wording for external disclosures based on Board feedback	P Wilson	M Kay
2.2	19/05/23	Removed reference to General Counsel	P Wilson	n/a
2.3	25/10/23	Created separate version for external parties	P Wilson	M Kay
2.4	30/10/24	Added sexual harassment as an example of wrongdoing	P Wilson	M Kay