ITF Licensing (UK) Limited,
Bank Lane, Roehampton,
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www.world.tennis
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World Tennis Whistleblowing Policy

Purpose and scope of this policy

This policy is intended to encourage the reporting of serious concerns about wrongdoing, risk or malpractice so that they can be addressed promptly and appropriately. While the policy is primarily designed for employees and workers, World Tennis welcomes concerns raised by anyone who becomes aware of such issues in connection with our activities, including contractors, consultants, agency workers, suppliers and others working with or on behalf of World Tennis.

Certain legal protections under whistleblowing legislation apply only to defined categories of worker. However, all concerns raised in good faith under this policy will be taken seriously, handled fairly and, where appropriate, investigated.

Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for those who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made by you where you have reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- sexual harassment, or a failure by an employer to take reasonable steps to prevent sexual harassment, including harassment by third parties;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You have no responsibility for investigating the matter - it is an employer's responsibility to ensure that an investigation takes place.

If you make such a protected disclosure you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure.

We encourage you to raise your concerns under this procedure in the first instance. If you are not sure whether or not to raise a concern, you should discuss the issue with your line manager or the Executive Director, HR where appropriate.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to you.

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- You will not be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training will not be prejudiced because you have raised a legitimate concern.
- Victimisation of anyone for raising a qualified disclosure will be a disciplinary offence.

Sexual Harassment Concerns

We are committed to providing a work environment free from sexual harassment and to complying with its duty under the Equality Act 2010 to take reasonable steps to prevent sexual harassment.

You are encouraged to raise, under this Whistleblowing Policy, any concerns that:

- sexual harassment has occurred or is occurring;
- there is a risk of sexual harassment due to behaviours, practices, culture or inadequate safeguards; or
- World Tennis has failed to take reasonable steps to prevent sexual harassment, including harassment by third parties such as contractors, agents, suppliers or participants at World Tennis events.

You do not need to be the person directly affected in order to raise such a concern.

Stage 1 – Raising a whistleblowing concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it promptly and internally in the first instance.

You may raise a concern by:

1. Speaking to your line manager; or
2. Contacting a senior manager, Head or Executive Director; or
3. Contacting the HR team; or
4. Using the World Tennis's confidential whistleblowing reporting channel (see email address below under section heading '**Raising your whistleblowing concerns externally**'

If your concern relates to senior leadership, or you believe it would be inappropriate to raise it via the above routes (1-3), you should use the confidential whistleblowing reporting channel.

It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible.

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Stage 2 – Responding to your whistleblowing concern

Once a concern is raised:

- It will be assessed promptly to determine the appropriate action;
- An investigation may be conducted by an appointed and appropriate senior manager, HR or an external and independent investigator;
- You may be contacted for further information, where appropriate;
- We will aim to provide feedback on the outcome, subject to confidentiality and data protection constraints.

Stage 3 – Appeal

If you are not satisfied with how your concern has been dealt with, you may appeal. It is important that you set out clearly the grounds of your appeal, ie the basis on which you consider that your original concern has not been satisfactorily dealt with.

The appeal will be reviewed by a more senior manager or an appropriate independent person who was not involved in the original investigation.

You may be invited to a meeting to clarify the basis of your appeal and HR may support the appeal process where appropriate.

The appointed reviewer will consider whether the original handling of the concern was reasonable and proportionate.

You will be informed in writing of the outcome.

Confidentiality and anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

Alternatively, you may decide to raise a whistleblowing concern anonymously. You can do this via this link: Whistleblowing Form - Formstack.

We encourage you to raise concerns openly where you feel able to do so, as this often enables a more effective investigation. However, we recognise that this may not always be possible and therefore accept anonymous reports rather than no report being made at all.

Our commitment to you

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to a senior member of staff, the HR team or through World Tennis's confidential whistleblowing reporting channel. Alternatively, you can raise it under our Grievance Procedure (see separate policy) if it applies to you.

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Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that anyone has knowingly raised false allegations, this will also be treated as a disciplinary offence. This applies only where it is proven that an allegation was deliberately false or malicious. No action will be taken against individuals who raise concerns honestly and with a reasonable belief, even if those concerns are not ultimately substantiated.

Raising your whistleblowing concerns externally

We encourage you to raise whistleblowing concerns internally in the first instance. However, if you would prefer not to do so, if your concern relates to a member of senior management, the CEO or the President or, if for any other reason you believe it is inappropriate or undesirable to report the matter internally, you may use the independent confidential reporting service (confidential email address: whistleblowing@world.tennis*).

The service is monitored by a person appointed by the World Tennis Remuneration Committee, whose remit includes management of the World Tennis Whistleblowing policy.

*** *Please only use this email address as it is intended. Any other concerns should be reported via the Whistleblowing form (link above). Your email may not be responded to or dealt with otherwise.***

The appointed person is someone outside the organisation who understands World Tennis's structure and operations, but is not employed by World Tennis and is not involved in its day-to-day activities. Please refer to Stage 1 of the process above for information on what you should include in your message.

Please also note the *'confidentiality and anonymity'* clause within this policy.

If the complaint refers to the CEO or President, Stage 2 and Stage 3 of the procedure included in this policy will be followed and (if you have waived anonymity) you will be contacted by either the appointed external person or the Chair of the Remuneration Committee to whom the matter will be referred. If required, they will in turn bring the complaint to the attention of the Board of Directors. Our external employment law solicitors may provide advice relating to procedure only.

Any investigation undertaken will be conducted by an independent agency and their report will be presented to either the Remuneration Committee or the Board of Directors for final decision and the Chair of the Remuneration Committee will be responsible for communicating relevant outcomes plus the appeal procedure to you.

Finally, if you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on GOV.UK) who may carry out their own investigation into the concern raised

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

END.