



Whistleblowing Policy and Procedure

Definition

Whistleblowing is the name given to the act of disclosing information to the employer, or the relevant authority, if you know, or suspect, that Metaverse VR (MVR) is responsible for or has taken part in some wrongdoing.

Qualifying Disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information you genuinely and reasonably believe is in the public interest and shows MVR has committed a “relevant failure” by:

- committing a criminal offence;
- failing to comply with a legal obligation;
- a miscarriage of justice;
- endangering the health and safety of an individual;
- environmental damage, or
- concealing any information relating to the above.

These acts can be in the past, present or future, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. MVR will take any concerns you may raise relating to the above matters very seriously.

If you reasonably believe the disclosure is “in the public interest”. We encourage you to use the “Whistleblowing Procedure” to raise your concerns.

Employees making qualifying disclosures are protected against dismissal or detriment by “The Public Interest Disclosure Act 1998”.

If you raise a concern under the “Whistleblowing Policy” where it is not appropriate to do so, as it relates to a personal grievance, you will be advised it should be addressed under the “Grievance Procedure”.

The Whistleblowing Procedure

Please report any concerns you may have to your line manager. If your concern relates to your line manager or it is not appropriate to make the report to your line manager, please report it to the COO. All concerns reported will be treated in the strictest confidence. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

If you feel unable to report your concerns internally, you should report them directly to the appropriate organisation or regulatory body with authority for the matter of concern.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with you. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence and/or can identify any witnesses. This meeting will be held within 5 working days following receipt of the disclosure.

After this meeting, the Investigating Manager will commence a full investigation into the concerns you have raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the Investigating Manager will write to you confirming the outcome.

If you are not satisfied with the explanation or outcome, you may raise the matter with the appropriate official organisation or regulatory body. Alternatively, you may raise a formal complaint under the “Grievance Policy and Procedure”.

Formal Action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against Detrimental Treatment

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Harassment, including bullying, or any other detrimental treatment afforded to you after making a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action in line with our “Disciplinary Policy and Procedure”.

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Registered in England: 13684068, VAT No: GB 399750824.

Registered office: 3.05, Innovation and Collaboration Hub Portsdown Technology Park, North Hill Portsmouth, PO6 3RU

Tel: +44 (0) 2393 552 794 Email: info@metaverse-vr.co.uk