

# NIGHTCAP

<b>Policy Name</b>	Whistle Blowing Policy
<b>Policy Date of Issue</b>	April 2026
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<b>Policy Review Date</b>	April 2027
<b>Exec Board Sponsor</b>	Compliance Officer
<b>Policy Owner</b>	Head of People
<b>Related Documents</b>	

## Scope

This policy applies across all Nightcap venues in the UK, including the Support Office. It covers all employees, consultants, contractors, agency workers, and individuals working in joint ventures (collectively referred to as “team members”).

## Purpose

Nightcap is committed to conducting business with honesty, integrity, and accountability.

This policy provides a clear and safe framework for raising concerns about suspected wrongdoing or risks within the business. It supports a culture where individuals feel able to speak up, knowing that concerns will be taken seriously and handled appropriately.

## Our Commitment

We encourage all team members to raise concerns as soon as possible where they believe wrongdoing may have occurred or may occur.

You will be supported when raising genuine concerns, even if they turn out to be mistaken. No one should suffer any form of detrimental treatment for speaking up.

Managers are expected to create an environment where team members feel able to speak up and to act appropriately on concerns raised.

## What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing or danger in the workplace.

A whistleblowing concern is a **“protected disclosure” under UK law**, where an individual reasonably believes the information shows wrongdoing in the public interest.

This may include:

- Criminal activity
- Failure to comply with legal or regulatory obligations
- Miscarriages of justice
- Risks to health and safety
- Environmental damage
- Bribery or corruption
- Facilitating tax evasion
- Financial misconduct or fraud
- Breach of internal policies or procedures
- Conduct that may pose a significant risk to the Company’s reputation or financial integrity

- Unauthorised disclosure of confidential information
- Negligence
- Deliberate concealment of any of the above

You do not need proof of wrongdoing, only a reasonable belief that the information is true.

### What this Policy is Not For

This policy is not intended for personal employment concerns (such as how you have been treated at work), which should normally be raised through the Grievance Policy.

However, if your concern also involves wider wrongdoing or risks to others, it may be appropriate to raise it under this policy.

### How to Raise a Concern

You can raise a concern in the way that feels most appropriate to you:

- Speak to your line manager
- Contact the Compliance Officer
- Contact the People Team
- Use the independent whistleblowing service

If your concern involves your line manager, Compliance Officer, or a member of the Executive Board, you should raise it with the Chairperson of the Board or via the independent whistleblowing service.

Reports can be made confidentially and, where appropriate, anonymously.

Compliance Officer	Michael Toxvaerd <a href="mailto:michael@nightcapgroup.com">michael@nightcapgroup.com</a>
Chairperson of the Board	Gareth Edwards <a href="mailto:garethmedwards1@gmail.com">garethmedwards1@gmail.com</a>
Independent Whistle Blowing Service Provider	Hospitality Action Helpline: 0808 801 0351
Protect (formerly Public Concern at Work) (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>

### What Happens Next

#### 1. Acknowledgement

We aim to acknowledge concerns within 48 hours.

#### 2. Initial Assessment

An initial review will be carried out to determine how the matter should be handled.

#### 3. Investigation

Where appropriate:

- An impartial investigation will be conducted
- Evidence may include interviews, documents, and other relevant information
- You may be invited to attend meetings and can be accompanied

#### 4. Outcome

- You will be informed of the outcome where appropriate
- Confidentiality obligations may limit the level of detail shared

#### 5. Ongoing Communication

We will aim to keep you informed of progress throughout the process.

Nightcap Limited

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## **Confidentiality and Anonymity**

We hope team members feel able to raise concerns openly.

If you request confidentiality, we will make every effort to protect your identity. Where disclosure is necessary, we will discuss this with you.

Concerns may also be raised anonymously. While this may limit our ability to investigate fully, all concerns will be taken seriously.

## **Protection for Whistleblowers**

No individual will suffer any detrimental treatment for raising a genuine concern.

Detrimental treatment includes:

- Dismissal
- Disciplinary action
- Threats
- Unfavourable treatment

Any retaliation against a whistleblower will be treated as serious misconduct.

## **False or Malicious Allegations**

If it is determined that a concern has been raised maliciously or in bad faith, this may result in disciplinary action.

## **If You Are Not Satisfied**

If you are not satisfied with how your concern has been handled, you may escalate it to:

- The Chairperson of the Board
- The Company's external auditors
- The independent whistleblowing service

## **External Disclosures**

In most cases, concerns should be raised internally first.

However, the law recognises that it may be appropriate to report concerns to external bodies such as regulators. Independent advice can be sought before doing so.

## **Third-Party Concerns**

Whistleblowing concerns may relate to third parties such as guests, suppliers, or service providers. These should be raised internally in the first instance so they can be appropriately reviewed and addressed.

## **Monitoring and Review**

Nightcap may review themes and trends arising from whistleblowing concerns to identify and address systemic risks.

This policy will be reviewed regularly to ensure it remains effective and compliant.

## **AMENDMENTS TO THIS POLICY**

This Policy does not form part of your Terms and Conditions of Employment and may be varied from time to time. The Company will periodically review this policy and reserves the right to vary, amend or withdraw the policy. Any policy changes will be communicated to you accordingly.