

Open Media Policies

Policy Contents

03	Anti-Bribery	35	Flexible Working
06	Child Labour	39	Whistleblower
08	Disciplinary	42	Sexual Harassment
13	EDI	45	Work From Home
15	Fair & Equal Pay	47	Conflict of Interest
17	Grievance	51	Modern Slavery & Trafficking
19	Health & Safety	53	Employee Termination
21	Holidays	55	Recruitment
23	Maternity	58	Neonatal Care Leave & Pay
25	Paternity	61	Internal Promotion
27	Sickness Absence	63	Retirement
29	Social Media	65	Complaints Process
31	Wellbeing	68	Parental Leave
33	Carer's Leave		

Anti-Bribery Policy

Introduction

Our organisation is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

Policy Principles

This policy outlines our position on preventing and prohibiting bribery. Our organisation will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

This policy applies to all employees of our organisation, and to temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, our organisation (“associated persons”).

The policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

Every employee and associated person acting for, or on behalf of, our organisation is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to our reputation and standing.

Our organisation may also face criminal liability for unlawful actions taken by its employees or associated

persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time.

This policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, our organisation; and the consequences of any breaches of this policy.

Bribery Act 2010

Our organisation is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.

A bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public or business activities or any activity performed in the course of a person’s employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed if:

- an employee or associated person acting for, or on behalf of, our organisation offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, our organisation offers, promises, or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- our organisation does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

Employees or associated persons are prohibited from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain a:

- commercial, contractual, or regulatory advantage

for our organisation in either obtaining or maintaining organisation business, or

- personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers, and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Corporate entertainment, gifts, hospitality, and promotional expenditure

Our organisation permits corporate entertainment, gifts, hospitality, and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of our organisation

Provided that it is:

- arranged in good faith; and
- not offered, promised or accepted to secure an advantage for our organisation or any of its employees or associated persons or to influence the impartiality of the recipient.

We will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the CEO.

Employees are required to set out in writing:

- the objective of the proposed client entertainment

or expenditure;

- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

We will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. We will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or a particular business benefit was being sought (for example prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers, or other business contacts should be reported immediately to the CEO.

Action by our organisation

We will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. We will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, our organisation who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the Serious Fraud Office and the police. We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the CEO is required, together with details of the intended recipients, reasons for the gift and business objective.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with our expenses policy.

Child Labour Policy



Introduction

Open is committed to building an organisation that is sustainable, ethical and champions the rights and freedoms of everyone.

Policy Principles

‘People’ is one of three pillars of our business strategy, and we recognise our responsibility to help improve, develop, and support the lives of individuals and groups within our workplace and the communities in which we operate.

We recognise it is our duty to identify and ensure the welfare and protection of any child or young people within our business, supply chains or partnerships.

Definitions

In this policy, the definitions as follows:

“Child” means anyone under 16 years of age, unless national or local legislation stipulates a higher mandatory school leaving or minimum working age, in which case the higher age shall apply.

“Child labour” means any work carried out by a child or young person.

Our Objectives

Through effective governance, Open will strive to protect the rights of young workers and remedying child labour by:

- Carrying out adequate right to work checks before recruiting any individual to employment in Open.
- Supporting meaningful and suitable work for young persons, ensuring that they are not subjected to any hazardous work
- Identifying any concerns about young, migrant workers in its recruitment process and immediately reporting to the relevant authorities
- Supporting and encouraging our partners and suppliers to demonstrate transparency on conditions and practices and to engage with Open in providing related information as requested.
- Requesting information about the supply chains of our suppliers and partners to ensure a thorough approach to identifying and eliminating child labour.
- Where child labour has been identified; supporting the welfare of that child or young person to safety.

Supplier and partner expectations

Open expect all suppliers and partners to share our commitment to eliminating child labour within their own business operations and those within their supply chains.

We expect all suppliers and partners to:

- Continuously review and monitor their business operations and those of their suppliers, service providers or partners

- Make Open aware immediately of any concerns regarding child labour within their operations or those of their suppliers, service providers or partners.
- Share their child labour policy and/or prevention systems with Open Media as and when requested.
- Provide a guarantee to Open Media that their recruitment processes include verification and accuracy of right to work documents.
- Where young workers are employed, ensure that all relevant legislation is adhered to, and the welfare of those individuals is a priority within the workplace.

Cessation

Open Media reserves the right and is prepared to terminate its relationship with suppliers or partners where they are found to be in deliberate breach of this policy or do not support its objectives.

Responsibility

The CVO and Operations Manager maintain responsibility for this policy and will review it in collaboration with HR, partners and suppliers to ensure compliance with up-to-date legislation and best practice.

Disciplinary Policy



Introduction

As an employer, we hope that this policy is something that we apply rarely and that you have don't have to refer to. However, occasionally we may have to rely on this policy to address poor conduct or performance and to ensure that we maintain a harmonious and productive working environment.

Policy Principles

The purpose of this policy is to bring about improvement and it will be applied with that in mind. If you are subject to disciplinary action, you can be assured that the correct procedure will be followed, and we will ensure fairness and consistency in our approach across the company.

In the case that disciplinary action is taken against you (except for dismissal), the improvements required of you and the relevant time-frames will be clearly outlined to you and we will identify any ways in which we can support you to achieve those outcomes.

- No disciplinary action will be taken against any employee until the case has been fully investigated.
- At every stage in the procedure the employee will be advised of the nature of the complaint against them and will be given the opportunity to state their case before any decision is made.
- At all stages the employee will have the right to be accompanied by a work colleague or trade union official.

- No employee will be dismissed for a first breach of discipline except in the case of gross misconduct when the penalty may be dismissal without notice or payment in lieu of notice.
- An employee will have the right to appeal against any disciplinary sanction imposed.
- Open Media reserves the right to appoint an Independent Professional Adviser with experience of disciplinary procedures and appeals to support in the investigation and/or disciplinary process.
- The procedure may be implemented at any stage if the employee's alleged misconduct warrants such action.

All employees have the right to Appeal in writing within 5 working days of being informed of the decision.

The Procedure

If you are subject to disciplinary action, a thorough investigation will take place by an appointed manager before any decision to proceed is take. Should it be recommended that disciplinary action is taken, you will always be notified in writing of the allegations, invited to a hearing to state your case and provided with all investigation documents.

A manager who has not been involved in the case will chair the disciplinary hearing, and you have the right to be accompanied by a colleague or Trade Union representative of which you are a member.

Minor faults will be dealt with informally but where the matter is more serious the following will be used.

Disciplinary sanctions

The potential outcomes of a disciplinary hearing are as follows:

1. No further action
2. A verbal warning (first stage)
3. A first written warning (second stage)
4. A final written warning (final stage)
5. Dismissal (with notice, or without notice in cases of gross misconduct.)

Where a first offense is considered significantly serious, the disciplinary manager has the right to jump to the second or final stage. If the allegations against you are proven to be considered gross misconduct, you will summararily be dismissed without notice.

Right of appeal

You have the right to appeal any disciplinary action taken against you. Any appeal will be heard by a senior manager or Director who has had no previous involvement in the case.

A Three-Step Process

Step 1: The Written Statement

The reasons for the disciplinary action will be given to you in writing and a time proposed for a formal hearing. You will receive the written statement in good time before the proposed hearing to allow you time to consider your response.

Step 2: The Hearing

You have a duty to take all reasonable steps to attend the hearing. You have the right to be accompanied by a work colleague or trade union official. The meeting will be held by a senior manager, and you will have the opportunity to state your side of the case. You will then be informed of the decision in writing. You have the right to appeal against the decision.

Step 3: The Appeal Meeting

If you wish to appeal you must inform the Manager who carried out the disciplinary hearing in writing within 5 working days of the decision. You have the right to be accompanied by a work colleague or trade union official. Following the appeal meeting you will be informed of the decision in writing.

Stage 1 – Verbal Warning

If conduct or performance does not meet acceptable standards the employee will normally be given a formal Verbal Warning. They will be advised of the reason for

the warning (that is the first stage of the disciplinary procedure) and of their right of appeal. A written statement of the Verbal Warning will be kept but it will be spent after 3 months, subject to satisfactory conduct and performance.

Stage 2 – Written Warning

If the offence is a serious one, or if a further offence occurs, a written warning will be given to the employee by the supervisor. This will give details of the complaints, the improvement required and the timescale. It will warn that action under Stage 3 will be considered if there is no satisfactory improvement and will advise of the right of appeal.

The written warning will be kept on record but will be spent after 6 months subject to satisfactory conduct and performance.

Stage 3 – Final Written Warning or Disciplinary Suspension

If there is still failure to improve and conduct or performance is still unsatisfactory, a final written warning will normally be given to the employee. This will give details of the complaint, will warn that dismissal will result if there is no satisfactory improvement and will advise of the right of appeal. The written statement will be kept on record but will be spent after 12 months (in exceptional cases the period may be longer) subject to satisfactory conduct and performance.

Stage 4 – Dismissal

If conduct or performance is still unsatisfactory and the employee still fails to reach the prescribed standards, dismissal will normally result. Only the appropriate senior manager can take the decision to dismiss. As soon as reasonably practicable, the employee will be provided with written reasons for dismissal, the date on which employment will terminate and the right of appeal.

Offences that could warrant dismissal are detailed in the following list and provides examples of offences which are normally regarded as gross misconduct:

- Theft, fraud, deliberate falsification of records.
- Fighting, assault on another person
- Deliberate damage to Organisation property
- Attending work under the influence of drink or drugs
- Consumption of alcohol or use of drugs whilst on the premises
- Negligence which causes unacceptable loss, damage or injury
- Acts of insubordination, refusal to carry out lawful and reasonable orders
- Racial/religious/sexual harassment, bullying

- Clocking in or out for another person
- An offence committed in breach of a warning for a minor offence
- Absence from the Organisation premises without permission
- Smoking in areas or at times not allocated for smoking
- Unauthorised use of the Organisation’s transport and equipment e.g. road transport, forklift trucks
- Misuse of email / Internet.

It should be clearly understood that the list of offences given is not in any way exhaustive, i.e., there may be other offences which are not listed but which require equal action by the Management.

Where a first offense is considered significantly serious, the disciplinary manager has the right to jump to the second or final stage. If the allegations against you are proven to be considered gross misconduct, you will summarily be dismissed without notice.

Investigation Suspension

If the employee is accused of an act of gross misconduct, they may be suspended from work on full basic pay, normally for no more than 5 working days, while Open Media investigates the alleged offence. If, on completion of the investigation and the full disciplinary procedure, Open Media is satisfied that gross misconduct occurred,

the result will normally be summary dismissal without notice or payment in lieu of notice following a Disciplinary Hearing.

Other Offences

The following are examples of offences that would warrant the employees concerned liable to disciplinary action:

- Inefficiency on the job and/or poor standards of workmanship
- Unreasonable lateness or absenteeism or failure to report the absence within a reasonable time as required by rules
- Using foul or obscene language
- Absence from place of work without permission
- Sky larking or carelessness where a possible danger to other employees or damage to the Organisation’s property or products may result
- Unauthorised presence in a department other than the employee’s normal working area
- Failure to conform with the rules as set out in the Organisation’s Rules and Notices
- Failure to conform to the Health and Safety regulations or act in a manner which would put the employee or others at risk.

Please note, the above list is not exhaustive, and the Di-

rector(s) will have the final decision about what constitutes a disciplinary offense.

Appeals Against Disciplinary Action

The employee may appeal to the Director(s) following a disciplinary hearing decision and every effort will be made to resolve the issue. The Director(s) may appoint another senior manager or an independent person to hear the appeal. An employee who wishes to appeal against any disciplinary decision must do so within 5 working days and this must be done in writing. The final decision rests with the Director(s) in the case of dismissal. The appeal will be held within 5 working days. The employee has the right to be accompanied at the hearing by a work colleague or trade union official.

Capability Performance Procedure

Policy Statement

Capability is defined as: performance assessed by reference to skill, aptitude, health OR any other physical OR mental quality.

Open Media will endeavour, wherever possible, to ensure that all employees are aware of, and fully understand, the expectations and standards operating within the organisation. This Capability procedure has been developed to ensure that unsatisfactory performance or failure to achieve the standards set are responded to in a fair and effective manner in accordance with the principles of natural justice.

Levels of Incapability

There are three levels set out in this procedure and these are as follows:

1. Incapability

- A level of incapability which impinges on the ability of the employee to undertake their duties, and which has an impact on service delivery.
- An act/decision at a level within Open Media that has a significant detrimental impact on service delivery or to Open Media.

2. Serious Incapability

- Serious level of incapability which impinges on the ability of the employee to undertake their role and which has a significant impact on service delivery e.g. alcohol or drug abuse.

3. Gross Incapability

- Normally a single incident which has an unacceptable impact on service delivery or to Open Media when it is considered that the matter relates to the capability of the employee, rather than an act of indiscipline.

Informal Action

When a manager with responsibility for initiating action under this procedure (normally the line manager) considers that action should be taken to encourage an employee to improve, they may conduct an informal discussion with the employee.

This will be used to bring to the employee’s attention the reasons why it is felt that the employee is not performing satisfactorily, ascertain whether the employee accepts that there is a problem, listen to any explanations or statements made by the employee, and discuss how the employee should seek to improve.

Following the discussion appropriate arrangements will be made to supervise and monitor the employee’s continuing performance (perhaps via an action plan), usually by the employee’s immediate supervisor, with the employee being required to co-operate in this monitoring process.

Capability Performance Procedure - Stage 1

If, after allowing a reasonable time for improvement, it is considered by the responsible manager that the employee has failed to achieve a satisfactory level of performance, the employee will be required to attend a formal disciplinary hearing to discuss the matter.

The normal disciplinary procedure will apply.

Outcome - Stage 1

If unsubstantiated:

- You will be informed of the decision at the interview and it will be confirmed by letter within five working days.
- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been raised (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in

the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

- You will be issued with a Verbal Warning at the interview and advised that any further breaches of the capability (performance) procedure or departure from the agreed plan may ultimately lead to you being dismissed.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised of the appeal process.

Capability Performance Procedure - Stage 2

If, after a reasonable time has been allowed for improvement, the responsible manager considers that the employee's performance remains less than satisfactory, a further formal disciplinary hearing will take place.

Outcome - Stage 2

If unsubstantiated:

- You will be informed of the decision at the interview and it will be confirmed by letter within five working days.
- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been raised (e.g. possibly involving one or more of training,

general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

- You will be issued with a Written Warning at the interview and advised that any further breaches of the capability (performance) procedure or departure from the agreed plan may ultimately lead to you being dismissed.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g., possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised of the appeal process.

Capability Performance Procedure - Stage 3

If, after a reasonable time has been allowed for improvement, the nominated officer considers that the employee's performance remains less than satisfactory, a further formal disciplinary hearing will take place.

Outcome - Stage 3

If unsubstantiated:

- You will be informed of the decision at the interview and it will be confirmed by letter within five days.
- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been

raised (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

- You will be issued with a Final Written Warning at the interview and advised that any further breaches of the capability (performance) procedure or departure from the agreed plan may ultimately lead to you being dismissed.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised of the appeal process.

Capability Performance Procedure - Stage 4

At stage 4 only a nominated officer together with a representative from HR will review the case.

If, the nominated officer feels that the employee's performance remains less than satisfactory, a further formal disciplinary hearing will be convened.

Outcome - Stage 4

If unsubstantiated:

- You will be informed of the decision at the interview and

it will be confirmed by letter within five working days.

- You will agree an action plan, if appropriate to help you to overcome any problem, which may have been raised (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).

If substantiated:

One of the following options will be applied:

- You will be issued with a notice of dismissal.
- You will agree an action plan, to help you to overcome any issue in relation to your performance (e.g. possibly involving one or more of training, general assistance, supervision by someone skilled in the work, encouragement, monitoring outcomes, and subsequent discussion of progress).
- You will be advised that any further occurrences of incapability or misconduct may result in dismissal.
- You will be advised of the appeal process.

Equality, Diversity & Inclusion Policy



Introduction

People are what make Open. We embrace a team that is diverse, champion equality and feel passionately about everyone feeling included and proud of their individuality.

Policy Principles

Open takes a zero-tolerance approach to discrimination in any form.

We expect everyone in our team, to take personal responsibility for observing, upholding, promoting, and applying this policy.

We are committed to promoting a working environment that embodies dignity, mutual trust, and respect and one that is free from discrimination, harassment, bullying or victimisation.

We will ensure that every element of Open’s internal and external processes and interactions, such as re-cruitment, promotion and our dealings with suppliers and clients do not treat people less favourably because of their:

Disability; gender, gender identity or gender reassignment status; marital status; race, racial group, ethnic or national origin, or nationality; religion or belief; sexual orientation; age; civil partnership status; pregnancy or maternity; paternity;

or their:

educational background; socio-economic background; caring responsibilities; part-time status; or fixed-term status.

Your individuality

We support any member of our team, new or existing, to be themselves in work and embrace their individuality. We welcome any information you wish to share with us that will help us and the team to support you, such as use of different pronouns.

Shared responsibility

We expect everyone to take responsibility for upholding the principles of this policy and contributing to a positive, inclusive working environment.

We are committed to informing our team about how to do this and we will do this by raising awareness internally through training sessions, encouraging open and safe discussions and leaning on external resources where necessary.

You will be expected to take part in any initiatives relating to Equality, Diversity and Inclusion and respect the wishes of any our team relating to their individuality.

Fair & Equal Pay Policy



Introduction

Open is committed to building an organisation that champions equality, diversity, and inclusivity and we recognise that pay forms a key part of our objectives in this area.

Policy Principles

We are committed to ensuring that equal pay is afforded for like for like work and of equal value and we recognise the unique value that everyone brings to our organisation.

We will go beyond compliance with relevant pay legislation and work to identify and eliminate unfair and unjust practices relating to pay.

Our Practice

We will achieve our objectives relating to fair and equal pay through the development of effective systems, leadership and in collaboration with our workforce, we will:

- Carry out equal pay audits to identify and rectify discrepancies.
- Implement structured pay reviews across the whole workforce and ensure that pay increases are transparent and justified.
- Not discourage discussions around pay among staff or treat any individual unfavourably for doing so.

- Provide training and guidance for managers who are involved in determining pay.
- Carry out benchmarking exercises to determine pay for new roles.
- Ask for feedback on fair pay through annual employee surveys to identify areas for development and encourage staff involvement.

Monitoring and Review

We will continuously monitor and review this policy and our practices to ensure that we are meeting our commitments of fair and equal pay within Open.

We will consider any feedback both internally and externally to identify areas of improvement and that we are continuously moving forward to achieve best practice in this area.

Grievance Policy



Introduction

We hope that any issues or problems you incur during your employment with Open can be resolved informally in the initial instance, however we recognise that sometimes a more formal approach is required where informal action is inappropriate or unsatisfactory.

This policy explains our approach to formal grievances.

Policy Principles

The purpose of this policy is to address any formal grievances you have relating to your employment, your colleagues or management. We will take any grievance seriously and it will be treated confidentially and shared only with those who are involved or need to know.

We recognise the difficulty of grievances for everyone involved and we encourage anyone involved in a grievance procedure to make use of our wellbeing policy and provisions to support you.

The Procedure

To raise a formal grievance, you must do so in writing, clearly outlining the points of the grievance including any relevant information such as dates and witnesses. You will then be invited to a grievance hearing chaired by a manager, who will listen to your case in more detail and commence with an investigation.

If a grievance is raised against you, you will be notified in writing and invited to an investigation meeting and given a fair and proper opportunity to respond to the allegations.

You have the right to be accompanied by a colleague or Trade Union representative of which you are a member at a grievance hearing. This entitlement does not extend to investigation meetings.

Outcomes

The potential outcomes of a grievance process are as follows:

- 1. Not upheld and no further action taken.
- 2. Partially upheld.
- 3. Fully upheld.

In cases where a grievance is partially or fully upheld, the grievance chair may recommend that disciplinary action is taken against the person(s) involved. We will always ask anyone raising a grievance what outcome they wish for or expect, and if appropriate we will aim to deliver this.

The grievance manager will make recommendations when delivering the outcome and we expect those involved to cooperate in achieving a positive resolution.

Right of appeal

You have the right to appeal the outcome of any grievance process. Any appeal will be heard by a senior manager or Director who has had no previous involvement in the case.

Further information

This policy should be read in conjunction with Open's Continued Grievance Policy (Appendix X).

Health & Safety Policy



Introduction

Open is committed to protecting the health, safety and welfare of its employees and the health and safety of other persons who may be affected by its activities.

Policy Principles

We will take steps to ensure that our statutory duties are always met, that health and safety is always a priority and that everyone feels safe within our working environment.

We will ensure that:

- All processes and system are designed to take account of health and safety, and are always properly supervised.
- A member of senior management maintains specific responsibility for health and safety.
- Competent people are appointed to assist us in meeting statutory duties including, where appropriate, specialists outside of the organisation.
- All employees are consulted on matters relating to health, safety, and welfare.
- Adequate facilities and arrangements will be maintained to enable employees to raise issues on health and safety.
- Each employee will be given such information, instruction, and training as is necessary to enable the safe performance of work activities.

- All arrangements are brought to employees’ attention and are monitored and reviewed to ensure that they are effective.

Monitoring and review

We will continue to monitor and review our health and safety policies and practices and lean on external suppliers and advisors to ensure that we are meeting our responsibilities at all times.

Annual Leave Policy



Introduction

Taking a break from work is essential to us all and we should all look forward to enjoying downtime, however we please! We strongly encourage you to use all your holiday entitlement to take regular breaks throughout the year and to spend some time focusing on you.

Policy Principles

Open's holiday year runs from 1st January to 31st December.

We encourage you to submit holiday requests with as much notice as possible and ask that for holidays over 5 days, you provide us with no less than 2 weeks' notice and 5 days' notice for anything less than this. This is to help us plan our resources in your absence.

We will endeavour to accommodate any holiday requests and will do what we can to avoid declining any requests. However, there may be times when we have business critical projects or events, or too many people off in your team already, that means that we can't accommodate your request. In the unlikely event that we need to cancel your pre-approved holiday request, we will give you notice amounting to no less than double the number of your planned days.

We don't permit holidays to be carried over into the following holiday year, so encourage you to ensure that you have booked most of your holidays by the middle of the year.

Procedure to follow

All holiday requests must be submitted via our online HR system; My HR Toolkit. Requests will be automatically sent to your line manager and you will receive an email notifying you of whether your request has been approved or not.

You should not take your request as approved until you have received a notification confirming this.

We recommend that you don't book or make any firm plans until your request has been approved.

Holiday Entitlement

Your individual holiday entitlement is outlined in your contract of employment.

Should you decide to leave Open, you will be paid for any accrued, unused leave up to your final working day. If by your leave date, you have used more holidays than you have accrued, this will be deducted from your final salary.

Holiday during sickness absence

You will continue to accrue holiday entitlement during any periods of sickness absence. If a period of absence falls over a pre-approved holiday, you can cancel this if you are unable to take your holiday.

Maternity Policy



Introduction

Firstly, congratulations on your lovely news! We are delighted for you and hope that you are enjoying your pregnancy journey. We appreciate that this can be both an exciting and challenging time for various reasons, so we are here to support you.

Policy Principles

Our aim is to ensure that you feel supported in work during your pregnancy, maternity leave, and eventual return to work, and we will do what we can to make you feel at ease during this exciting, but sometimes challenging time.

For full details, please refer to the Continued Maternity Policy (Appendix X).

Notifying us

As soon as you know that you are pregnant, please notify your manager and as soon as you have it, provide us with your MATB1 form. We ask that you do this so that we have the best interests of you and your baby at the forefront of our mind and can provide or signpost you to any support you might need. Please be assured that this disclosure would be confidential, and a manager would never share your news with anyone other than the CEO without your consent, on your behalf.

Antenatal appointments

Throughout your pregnancy, you will be expected to attend various antenatal appointments, and you will be paid for attending those during working hours and are not expected to make the lost hours up.

We just kindly ask that you give us as much notice as possible. We also understand that for some, these appointments might be difficult for a whole range of reasons, so we are here if you need any support, before or after your appointment.

Maternity leave

All pregnant employees are entitled to the statutory right to take up to 26 weeks maternity leave (OML). By law, you must take a minimum of 2 weeks following the birth of your baby.

The earliest you can start your leave is 11 weeks before the expected week of childbirth.

Maternity pay

Employees with more than 2 years' continuous service by the 14th week before the EWC, will be entitled to receive full pay for the first 5 months of their maternity leave. Any leave thereafter will be paid in accordance with SMP rates. Employees who leave Open Media during maternity leave or within 3 months of returning, will be required to repay any enhanced maternity pay less SMP entitlement.

Supporting you

Our main priority is to support you during and after your pregnancy, as you adjust to the many changes during this time in your life. We will be working continuously to improve the support we offer and would welcome any feedback to help us do this. We recognise that every individual's circumstances are different, so will vary from person to person. Please speak with your line manager or one of our Mental Health First Aid team to see how we can help.

Paternity Policy



Introduction

Firstly, congratulations on your wonderful news. We are delighted for you and hope you are looking forward to becoming a parent.

Policy Principles

Our aim is to support you in taking time away from work to welcome and bond with your new child. We are committed to providing a flexible and supportive approach to paternity leave.

Notifying Us

To take paternity leave following the birth of a child, you should provide us with written notice by the end of the 15th week before the expected week of childbirth (where possible). Your notice should include:

- The expected week of birth.
- The length of paternity leave you wish to take.
- The date you would like your leave to start.

We recognise that circumstances can change and will be as flexible as possible where this happens.

Antenatal Appointments

During your partner’s pregnancy, you are entitled to take paid time off to accompany them to up to two antenatal appointments.

We ask that you provide as much notice as possible. We also understand that these appointments can sometimes be challenging, and support is available if you need it.

Paternity Leave Entitlement

You have a Day 1 right to paternity leave, meaning there is no minimum service requirement to qualify.

You may take paternity leave if you:

- Are the biological father of the child, or the spouse, civil partner or partner of the child’s mother.
- Have, or expect to have, responsibility for the child’s upbringing (apart from the mother).

Paternity leave:

Can be taken as up to two weeks’ leave, either in one block or two separate blocks.

Must be taken within 52 weeks of the child’s birth or placement.

Can be taken regardless of whether Shared Parental Leave has been taken in respect of the same child.

Paternity Pay

Employees eligible for paternity leave will receive up to two weeks’ full pay in line with company policy.

Bereavement Provision

In the unfortunate event of the death of the mother

or primary adopter, you may be entitled to take up to 52 weeks of unpaid leave to care for the child. Please speak to your line manager or HR for guidance and support in these circumstances.

During Paternity Leave

During your paternity leave, you will continue to:

- Accrue annual leave as normal.
- Receive your usual contractual benefits.

Supporting You

Our priority is to support you as you transition into parenthood. We recognise that every individual’s situation is different and are committed to offering appropriate support.

If you need any assistance, please speak with your line manager or a member of our Mental Health First Aid team. We also welcome feedback to help us continue improving our support.

Sickness Absence Policy

Introduction

While we hope that our commitment to your health and wellbeing will support your attendance at work, we understand that from time to time, you may be unable to attend work due to reasons of ill-health.

We will endeavour to support every employee throughout periods of sickness absence while managing the operational needs of the organisation.

This policy outlines the procedure to follow if you are going to be absent from work, how we will manage both short and long-term sickness absence and the support we are able to offer you.

Policy Principles

We define short-term sickness absence as any period that lasts less than 3 calendar weeks. Persistent, short-term absence significantly impacts our operational capacity and so if we feel that your absence is becoming frequent, or is forming a pattern, your line manager will meet with you for a discussion to understand how we can support you to improve. A failure to improve your attendance over an agreed time-scale may lead to action under Open's disciplinary policy.

We define long-term sickness absence as any period that lasts more than 3 calendar weeks. We understand that absence of this duration normally relates to an underlying or ongoing health condition, and we will endeavour to support your eventual return to work. We will likely refer

you to Occupational Health for further information.

Procedure to follow

If you are going to be absent from work, please contact your line manager with as much notice as possible, but no less than 1 hour before your expected start time to help us plan our work around your absence.

We will need to understand the reason for your absence, how long you think you will be absent for and any immediate support we can offer.

Your line manager will agree with you when to check back in, but you will need to keep in touch to update us on how you are and when we can expect you back.

Fitness for work notes

If your absence lasts longer than 5 days, you will need to contact your GP and request a note to cover your period of absence. Open will, as far as practicable, implement any adjustments that the GP recommends to support you to return to work safely.

Pay during sickness absence

All employees (who have successfully completed their probation period) are entitled to 2 weeks full pay for sickness absence during a 12-month rolling period.

Statutory Sick Pay (SSP)

Employees who are still within their probation period, including any extension, or who have used their entitlement

to two weeks' full sick pay within a rolling 12-month period will receive Statutory Sick Pay (SSP) only, provided they meet the statutory eligibility requirements.

SSP is payable from the first full qualifying day of sickness absence. A qualifying day is a day on which the employee would normally be required to work. Employees must notify the Company of their absence in accordance with the sickness absence reporting procedures. Any withholding of SSP for late notification will be subject to statutory rules.

SSP will be calculated and paid in accordance with the statutory rates and regulations in force at the time. It is payable for up to 28 weeks in a single period of sickness absence or linked periods. Periods are linked where they are eight weeks or less apart. Any SSP included within Company sick pay counts towards this 28-week limit.

Further information

This policy should be read in conjunction with Open's Continued Sickness Absence Policy which provides full details of how sickness absence will be managed.

Sickness Absence Policy (Continued)

Short-term absence

We define short-term absence as any period of absence less than 3 calendar weeks.

We understand that occasional sickness can’t always be helped, but persistent short-term episodes of absence have a significant impact on our operations, as it is difficult to manage frequent, unanticipated absence within the team.

If we feel that your short-term absence is becoming too frequent, or has a pattern to it (i.e., grouped around a weekend or a holiday), you will be invited to a review meeting to discuss this.

Absence review meetings

We aim to manage short-term absence problems informally initially, to give you the opportunity to improve.

If you are invited to an absence review meeting, the first meeting will be informal, and your line manager will talk through your recent episodes of absence, identify any support you might need and outline the timeframes for you to improve.

Should we not see the expected improvements within the specified timeframes, you will be invited to subsequent review meetings which will form part of a formal absence management process.

At each formal meeting, you will be notified that a failure to improve at each stage will result in a formal disciplinary

warning. Should you continuously fail to improve, the formal warnings may eventually result in your dismissal.

If the reason for your absence is repetitive, we may recommend a referral to Occupational Health to identify whether there are any underlying conditions we need to support you with. If your short-term absence problem relates to an underlying condition, this may be managed under the ill-health capability process rather than the ordinary formal management process.

Long-term absence

We define long-term absence as any period of absence lasting, or expected to last, more than 3 consecutive calendar weeks.

If your absence is considered long-term, your line manager or HR will have weekly (unless otherwise agreed), welfare calls with you. The purpose of these calls is to check to see how you are, obtain any relevant update about your absence, update you about work (if you wish for us to) and ascertain what support we can offer you to help with your recovery back to full health.

With all long-term absence cases, we will recommend a referral to Occupational Health for an assessment. This assessment will provide us with further insight into your condition, how this is managed and recommendations for how we can support your eventual return to work.

We will then arrange to meet with you either at your home, our office, or a mutually suitable venue to discuss

the Occupational Health report with you and to agree next steps with you.

In the unfortunate circumstance of Occupational Health deeming you unfit to return to work in the immediate future, or recommending adjustments that OPEN is unable to accommodate, we may need to manage your absence based on capability that could result in your termination from the organisation on the grounds of ill-health.

Please be assured that this is a last resort, and we will of course endeavour to accommodate recommended adjustments and support your return to work as far as possible. We will never make decisions about your capability for work on the grounds of ill-health without the advice of an independent medical expert and may in some circumstances, request a second opinion.

Mental health-related absence

We understand and appreciate that mental health can be a cause of absence from work and that the types, symptoms, and impact of mental health conditions are wide-ranging and serious.

We promise to manage mental-health related absences with empathy, care, and compassion and in consultation with you so as not to exasperate your condition.

Whether an occasional occurrence or ongoing problem, we will support you and signpost you to the appropriate support where possible. We may suggest that you reach

out to one of our appointed Mental Health First Aiders (MHFA) for additional support. They will also be able to support you when you do return to work. Please be reassured that we wouldn’t share confidential information about your health with the MHFA’s or anyone else in the organisation other than the CEO and your immediate line manager, without your consent.

Social Media Policy



Introduction

As a Media organisation, we embrace and utilise various social media platforms in our everyday interactions, both internally and externally.

We recognise the important role it plays in our business and keeping us connected, but we also recognise its potential pitfalls and our individual preferences about social media in our personal lives.

Policy Principles

We are committed to using social media as a force for good within Open and making it enjoyable for everyone we interact with.

We want to ensure that social media is being used effectively and responsibly for business purposes, so please take note of the guidelines within this policy.

We also want to be sure that you’re comfortable with Open’s social media interactions with you and your preferences.

Internal platforms

We use a platform called Slack to communicate with each other internally. We find this helpful as a quick, easy, and informal way to keep the team updated about key information and to ensure that communication between us is fluid.

You will need to read our Slack communication guidelines to familiarize yourself with how we communicate and some of the boundaries we have set to ensure that it is effective for all of us.

Open’s social media and you

We regularly post about our team and their achievements on social media platforms, as we love to showcase externally the talent we have within Open.

However, we completely understand that some people may be uncomfortable with this, and we respect your wishes if you prefer not to be included in our outward communications.

Please confirm your preferences for photographs and tagging and we will update our Marketing team.

Social media in your personal life

We are happy for you to shout about the fact that you work for Open and encourage positive engagement with our posts.

However, we ask that you are mindful of how what you post could reflect on Open. If ever you’re unsure, just ask your line manager and who can advise you.

As an organisation that takes a zero-tolerance approach to discrimination, victimisation, or harassment in any form; any social media content either posted or interacted with by you that is offensive or goes against our disciplinary policy.

Social media for work

If your role involves posting on social media on behalf of Open, please refer to the guidance notes which your line manager can provide.

Wellbeing Policy



Introduction

The wellbeing of our team is a priority at Open and is a key part of our People Strategy. We recognise the importance of pro-actively managing health and wellbeing and we have a number of initiatives in place with the aim of supporting every individual to do this.

Policy Principles

We will support our team to manage their health and wellbeing in work and this will be embedded into our working practices at Open.

We are committed to ensuring that work does not negatively impact the health and wellbeing of any individual.

We will review and obtain feedback on our approach to wellbeing on an ongoing basis to continuously develop and improve the support we offer, to ensure that it is relevant and meets the needs of our team.

Mental Health support

We take mental health seriously at Open and will do what we can to support anyone suffering with any short or long-term mental health problems and conditions.

We have several appointed mental health first aiders who are trained in offering initial support and can signpost you to any additional resources you need. If you feel that you need any additional support with your mental health and wellbeing, please speak with one of our mental

health first aiders or your line manager in confidence. We're here to help.

Wellbeing Initiatives

We encourage every member of our team to utilise the wellbeing support tools we have in place, which are currently include the following:

Quartely wellness days

Every employee is entitled to take 1 day off work per quarter as a 'wellness' day to focus on your wellbeing. We recognise that sometimes you may need to just take a break, so there is no minimum notice that you need to request this. It is rare that we would decline a request, although we hope you appreciate that if something is business critical, it may be necessary.

Private Medical Care

Following successful completion of probation, every employee has access to private medical care with Aviva. Further details on how to access this will be provided to you after you probation period.

'Blue Monday'

Every January, we say no thank you to what is known as 'blue Monday' (the last Monday of January) by enjoying a day together as a team away from the office (usually in a spa!), to do something that will positively impact our wellbeing.

Carer's Leave Policy



Introduction

At Open Media, we recognise and celebrate the vital role you play as a carer. We are committed to your well-being as you balance the demands of caring responsibilities with your professional life.

Being a Carer

A carer is anyone with caring responsibilities who provides care, assistance and support to any other individual who may be seriously ill or unable to care for themselves. Whether you’re caring for a partner, child, parent, friend or any individual close to you, we want to support you on this journey.

Your Entitlement to Carer’s Leave

Carer’s are entitled to up to one week of unpaid leave in a 12-month period. Although the leave is unpaid, all other benefits will remain in place. The leave can be taken in blocks, days or half-days. A week of carer’s leave is the same duration as your normal working week.

The typical activities that carers undertake are wide ranging, including but not limited to:

- help with personal care and mobility
- managing medication
- practical household tasks
- emotional support and
- help with financial matters or administration

Applying for Carer’s Leave

We aim to make the process straight forward. When applying for carer’s leave please use the carer’s leave request form saved [here](#). Please provide as much notice as possible.

We will do our utmost to accommodate your leave however should we need to adjust due to business demands, we’ll work with you to find a suitable alternative.

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 taken, sought to take, or made use of the benefits of carer’s leave.

Other types of leave

The statutory right to carer’s leave is intended to be for planned and unforeseen caring commitments. If you need to take time off to manage an unexpected or sudden problem relating to a dependant please see our time off for dependants policy.

If you feel that you would benefit from a temporary or permanent change to your working arrangements to help balance your work and caring responsibilities, we encourage you to look at our flexible working requests policy.

Flexible Working Policy

Embracing Flexibility in Our Workplace

At Open Media, we understand that life is a juggling act and we're here to support you in achieving a balance that benefits everyone – making sure our teams are motivated, wellbeing is nurtured, and performance soars.

We understand that everyone has unique circumstances, and we are open to discussing how we can make your work life blend smoothly with your personal life.

Your Right to Request Flexible Working

All employees have the right to apply for flexible working and can make two requests in every 12-month period. While submitting a request isn't a guarantee of flexible working, every request will be met with genuine consideration.

To be eligible to make a request for flexible working:

- You have not made more than two applications in a 12-month period.
- If you have made another request, it must have been considered before submitting another.

Types of Flexible Working

We will consider requests for any type of flexible working with an open mind.

Examples of flexible working include:

- Hybrid working (time spilt between workplace and working remotely)

- Part-time working
- Homeworking
- Flexible hours
- Compressed hours

How to Apply for a Flexible Working Request

If you want to make a request for flexible working you can do so in writing (via letter or email) and specify the following:

- The date of the request
- The changes that you are seeking to your terms and conditions of employment
- The date on which you would like the change to come into effect
- A statement that this is a statutory request
- If and when you have made a previous application for flexible working and
- If you have made a previous request, when you made that application

The terms and conditions you can request to change only relate to hours, start/finish times and place of work.

Discussing Your Request

We promise to give your request the attention it deserves and if we need to talk it over, we'll arrange a meeting

within two months to understand better and explore possibilities together. Feel free to bring a colleague to support if you wish.

Making the Decision

If your requested change of working arrangements is accepted, the new terms and conditions that apply will be permanent.

If we can't grant your request, it is because of a significant business reason, and we'll clearly explain why no later than 14 days after the meeting unless an extension has been agreed. We will always aim to find alternative solutions that could work for you.

Embracing Change: Trial Periods and Appeals

We may need to test the waters with a trial period if we are not sure what impact it will have on the business. During this time the change to your terms and conditions of employment will be temporary.

If your request isn't approved, you have the right to appeal within 14 days of receipt of Open Media's decision and a meeting will be arranged. We will then confirm the outcome in writing within a further 14 days and this decision will be final.

Let's work together to make Open Media a place where flexibility helps us all do our best work.

Flexible / part-time workers

Employees who work flexibly or part-time hours will be treated no less favourably than employees who work full-time.

Every employee, regardless of working hours or patterns will have the same access to all of Open's benefits including private healthcare, holiday entitlement (on a pro-rata basis) and terms and conditions of employment.

Whistleblower Policy



Public Interest Disclosure Policy (Whistleblower Policy)

Introduction

Having an open and transparent culture at Open Media is very important to us. We encourage all individuals to raise concerns about malpractice or wrongdoing so that issues can be addressed appropriately and in a timely manner.

This procedure provides guidance to all employees, casual and temporary workers, agency staff, freelancers, trainees, home workers, contractors and third parties who wish to raise concerns in confidence.

Policy Principles

The Public Interest Disclosure Act 1998 (commonly known as the ‘Whistleblowing Act’) protects workers who raise genuine concerns in the public interest.

This includes protection from:

- Dismissal
- Detrimental treatment
- Victimisation by Open Media, colleagues, or third parties

Open Media is committed to ensuring that anyone who raises a concern in good faith is supported and protected.

Qualifying Disclosures

Certain disclosures qualify for protection under this policy. These include concerns that one or more of the following has occurred, is occurring, or is likely to occur:

- A criminal offence (e.g. theft, fraud, bribery)
- Failure to comply with a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate concealment of any of the above
- This policy also includes:
 - Sexual harassment as a qualifying disclosure, recognising it as serious misconduct and a potential breach of legal obligations
 - Third-party harassment (e.g. by clients, customers, suppliers or visitors) within the scope of reportable concerns

Scope of the Policy

This policy is not a substitute for the Disciplinary or Grievance Policy and should not be used for personal employment concerns unless they are in the public interest.

However, concerns involving serious misconduct, including harassment (internal or external),

may be raised under this policy where appropriate.

Your Protection

If you raise a genuine concern in the public interest:

- You will be protected from dismissal, disciplinary action, or any form of detrimental treatment

This includes protection from:

- Unfair treatment
- Loss of opportunities
- Harassment or retaliation
- Any disadvantage because you have raised a concern

This protection applies whether or not the concern is ultimately substantiated, provided it was raised in good faith.

Open Media will take appropriate action against anyone who subjects a whistleblower to detrimental treatment.

Your Confidentiality

Open Media will not tolerate victimisation of anyone who raises a concern.

You may raise concerns confidentially and request that your identity is protected. If it becomes necessary to disclose your identity (for example, in legal proceedings), we will discuss this with you before proceeding.

Anonymous disclosures are not covered by this policy,

but may still be considered at the organisation’s discretion.

Our Confidentiality Measures

To protect information, we will:

- Secure and store all documentation appropriately
- Restrict access to sensitive data
- Use secure systems for electronic records

Confidential information may be disclosed where legally required (e.g. regulatory investigations).

Disciplinary Consequences

Any breach of confidentiality or victimisation of a whistleblower will result in disciplinary action and may lead to dismissal.

How to Raise a Concern

Stage 1: Internal Team Lead

You should raise your concern in writing with your Team Lead or a member of the Senior Leadership Team, including:

- Details of the concern
- Relevant facts and evidence
- How you would like the matter to be investigated
- Any personal interest in the matter

Stage 2: Alternative Contacts

If you feel unable to raise the matter with your Team Lead, you may contact another member of the Senior Leadership Team.

All concerns will be taken seriously, investigated promptly, and handled confidentially.

You may be asked to provide further information or a written statement during the investigation. Once the investigation is complete, appropriate action will be taken.

If You Are Not Satisfied

If you feel your concern has not been adequately addressed, you may seek external support.

Relevant organisations include:

TimeTo

Confidential support for workplace sexual harassment

NABS

Mental wellbeing support for media professionals

Sexual Harassment Policy



Introduction

Open Media is committed to providing a work environment free from all forms of harassment, including sexual harassment. Open Media endeavours to create a respectful, inclusive, and environment for all where people feel safe and able to challenge unwanted behaviour towards them.

Every employee has a role in preventing harassment and upholding the values of our organisation and we take a zero-tolerance approach to any conduct that compromises our position on this.

This policy applies to all employees, contractors, clients, customers, and visitors in any work-related setting, including off-site events and online interactions.

Definitions

Harassment is defined as unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Sexual harassment is unwanted conduct of a sexual nature. Examples include, but are not limited to:

- making sexual remarks about someone’s body, clothing or appearance.
- asking questions about someone’s sex life.
- telling sexually offensive jokes.

- making sexual comments or jokes about someone's sexual orientation or gender reassignment.
- displaying or sharing pornographic or sexual images, or other sexual content.
- touching someone against their will, for example hugging them.
- sexual assault or rape.

Standards of behaviour

Open Media expects all employees and third parties to conduct themselves in a way that is respectful to all and will not tolerate any conduct that compromises another person’s dignity.

You must not:

- Make sexual remarks about someone’s body, clothing or appearance whether directly or indirectly.
- Ask questions about someone’s sex life.
- Make sexual jokes, comments or ‘banter’ about someone, or their sexual orientation or gender reassignment.
- Display or share pornographic or sexual images or other sexual content.
- Touch someone against their will or without their consent, for example hugging them.
- Engage in any unwanted behaviour of a sexual nature.

Work and social events

The rules relating to harassment apply at all work and work-related social events and to all employees, Directors and third parties, including clients, suppliers and visitors.

If you feel that you are experiencing harassment in any of those settings, you should report it immediately to your manager or a director who will take immediate action to ensure you feel safe.

Social media

Any employee found to be engaging in harassment of any sort via their social media accounts, they will be subject to action under the Company's disciplinary policy.

Third-Party Harassment

Open Media is also committed to protecting employees from harassment by third parties such as clients, customers, or visitors.

You should report any concerns you have to your manager immediately and must not feel pressured into continuing to engage with any third-party where you feel you are being harassed or feel unsafe.

Steps to take and reporting procedure

Employees who experience or witness harassment should:

- If comfortable, ask the harasser to stop

- If you do not feel comfortable speaking to the harasser, remove yourself from the situation where possible and report it immediately
- Document the incident(s)
- Report the behaviour to your manager or HR

All reports will be treated confidentially and managed under the Company's Grievance Policy and all parties involved will be supported appropriately.

You are protected from Sexual Harassment at work by the law under the Worker Protection Act 2023.

Protection from Retaliation

Open Media prohibits retaliation against anyone who reports harassment or participates in an investigation. Retaliation will be subject to disciplinary action up to and including dismissal.

An employee who reports a claim that is found to be unsubstantiated will not be penalised providing it was a genuine concern made in good faith. However, false allegations against any party will be subject to disciplinary action.

Policy Review

This policy will be reviewed annually and updated as necessary to ensure compliance with current legislation and best practice.

Specialist Support

We will support any employee affected by sexual harassment and specialist support is also available.

If you’re struggling to cope and need someone to talk to, you can contact:

- Samaritans
- LGBT Foundation

If you or someone you know needs help after sexual assault or rape, you can get specialist help and information from:

- Galop – LGBT+ sexual violence support
- Rape Crisis England and Wales
- Rape Crisis Scotland
- The Survivors Trust
- SurvivorsUK – for men and non-binary people affected by rape and sexual abuse
- Victim Support – in England and Wales
- Victim Support Scotland

Work From Home Policy

We understand that flexibility supports a work-life balance, therefore all employees are permitted to work from home (WFH) one day per week.

This policy sets out the guidelines and expectations for employees WFH to ensure balance a healthy work-life balance while ensuring productivity is not negatively affected.

Work Hours

- **Standard Work Hours**
You are required to work the same hours and pattern of work as you would typically work in the office.
- **Availability**
You must be reachable via email, phone or Slack as normal during work hours.

Communication and Collaboration

- Employees are expected to participate in team meetings, video calls, and collaborative projects as normal.
- Communication with clients or third parties should be clear, timely, and professional through company -approved tools like Slack and Google and you must ensure that your professionalism and dress is no different to how it would be in the office.

Equipment and Technology

- **Company Equipment:**
You must take care of any company equipment that you have taken home and ensure it is kept safe and secure.
- **Home Office Setup:**
You are responsible for setting up a suitable work environment at home, including a quiet space with reliable internet access.

Data Security and Confidentiality

- You must continue to follow all company protocols related to data security, confidentiality, and privacy when working remotely.
- Confidential company information must be stored securely and not shared outside the company. You must therefore ensure that you have privacy when making phone calls and that your laptop or any work-related material is not accessible to anyone else in your household

Performance Expectations

- You are expected to meet the same performance standards at home as when working in the office.
- If your line manager feels that productivity or performance standards are not met when WFH, you will be invited to a meeting to review its suitability.

Health and Safety

- You are responsible for ensuring that your homework environment is safe and ergonomic.
- We encourage you to take regular breaks as you would in the office, to support a healthy work-life balance.

Business needs

- There may be occasions whereby you are required to attend the office or external meetings on the nominated WHF day, as needed, based on business requirements, team needs, or company policy changes.

Conflict of Interest Policy

Introduction and Purpose

This policy outlines Open Media’s commitment to the importance of transparency and integrity in business operations, ensuring that all employees act in the best interests of the company and avoid situations where personal interests conflict with professional duties.

It applies to all employees, directors, contractors, and any other individuals involved in the operations of the business.

Definition of Conflict of Interest

A conflict of interest arises when an individual’s personal interests (financial, familial, or other) interfere with their ability to act in the best interests of the company.

This could include, but is not limited to:

- Personal relationships with clients, suppliers, or competitors.
- Financial interests in businesses that are competitors or have a relationship with the company.
- Outside employment or business ventures that may distract from or create a competing interest with the company.
- Gifts, favours, or entertainment that might influence decision-making.

Examples of Potential Conflicts

- Personal Financial Interest: An employee who owns a competing business or has a financial stake in a competitor or supplier.
- Relationships with Suppliers or Clients: An employee who has a close personal or family relationship with someone at a supplier or client company.
- External Business Activities: An employee engaging in a side business that competes with the company’s services or products.
- Acceptance of Gifts or Favors: Accepting gifts, entertainment, or other incentives from suppliers, clients, or competitors that might influence their professional decisions.

Duty to Disclose

All individuals are required to disclose any actual, potential, or perceived conflicts of interest to the relevant department or line manager. This should be done as soon as they become aware of any conflict.

Disclosures must be made in writing.

Management of Conflicts

The company will assess disclosed conflicts of interest on a case-by-case basis, determining whether the conflict can be managed, mitigated, or if the individual must recuse themselves from certain decisions or responsibilities.

Actions could include:

- Recusal from decision-making where there is a conflict.
- Reassignment of tasks or responsibilities.
- In certain cases, termination of external relationships or involvement.

Gifts and Entertainment

Clear guidelines on the acceptance of gifts or entertainment should be outlined, including:

- A prohibition on accepting extravagant gifts or those that could be perceived as attempting to influence decisions.
- A requirement to report any gifts received, particularly if their value exceeds a specified amount (e.g., £50).

Ongoing Monitoring

The company will review the conflict of interest policy regularly and train employees on its content to ensure that they understand their responsibilities.

Regular audits may also be conducted to ensure compliance and to identify potential conflicts early.

Bribery

Our organisation may face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated

persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time.

This section covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, our organisation; and
- the consequences of any breaches of this policy.

Bribery Act 2010

Our organisation is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.

A bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public or business activities or any activity performed in the course of a person’s employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed if:

- an employee or associated person acting for, or on behalf of, our organisation offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, our organisation offers, promises, or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence); and
- our organisation does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

Employees or associated persons are prohibited from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain a:

- commercial, contractual, or regulatory advantage for our organisation in either obtaining or maintaining organisation business, or
- personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers, and public officials.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Corporate entertainment, gifts, hospitality, and promotional expenditure.

Our organisation permits corporate entertainment, gifts, hospitality, and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of our organisation
- Provided that it is:
 - arranged in good faith; and
 - not offered, promised or accepted to secure an advantage for our organisation or any of its employees or associated persons or to influence the impartiality of the recipient.

We will authorise only reasonable, appropriate, and proportionate entertainment and promotional expenditure.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the CEO.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure;

- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

We will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. We will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or a particular business benefit was being sought (for example prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers, or other business contacts should be reported immediately to the CEO.

Action by our organisation

We will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. We will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, our organisation who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the Serious Fraud Office and the police.

We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the CEO is required, together with details of the intended recipients, reasons for the gift and business objective.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with our expenses policy.

Modern Slavery & Trafficking Policy



Purpose

Open Media is committed to acting ethically and with integrity in all our business dealings and relationships. We strive to implement and enforce effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere in our own business or in any of our supply chains. This policy outlines our commitment to preventing slavery and human trafficking in accordance with the Modern Slavery Act 2015.

Scope

This policy applies to all employees, agency workers, volunteers, contractors, suppliers, and other stakeholders engaged with Open Media. It covers all activities undertaken by or on behalf of Open Media.

Our commitment

Open Media is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Open Media operates with the core value of respect for human rights, and we are committed to:

- Ensuring that modern slavery, in all its forms including slavery, servitude, forced or compulsory labour, and human trafficking, has no place in our business operations or supply chains.
- Upholding transparency in our approach to combating modern slavery.

- Continually reviewing and improving our practices to combat modern slavery and human trafficking.

Risk Assessment and Due Diligence

Open Media will undertake the following actions to identify and mitigate risks related to modern slavery:

- Conduct regular risk assessments of our business and supply chains.
- Engage in due diligence processes when onboarding new suppliers, contractors, or partners, ensuring they align with our values and legal requirements regarding human rights and modern slavery.
- Monitor and review existing supply chains to ensure ongoing compliance with our modern slavery commitments.

Supplier Standards

We expect our suppliers and partners to:

- Comply with all applicable laws, including those relating to modern slavery and human trafficking.
- Ensure that their employees, agents, and subcontractors are not subjected to forced, compulsory, or trafficked labour.
- Demonstrate a commitment to ethical practices and respect for human rights.

Reporting and Whistleblowing

Open Media encourages all individuals working with us to report any concerns or suspicions of modern slavery in any parts of our business or supply chains. We have established a confidential whistleblowing procedure that allows individuals to report concerns without fear of retaliation.

Responsibilities

- Leadership: The leadership team at Open Media is responsible for implementing and reviewing this policy, ensuring it remains relevant and effective.
- Employees and Volunteers: All employees and volunteers are expected to uphold the principles outlined in this policy, report any concerns, and complete required training.

Employee Termination Policy



Purpose

The purpose of this policy is to give clear and transparent information on the termination procedure for an employee at Open Media, outlining notice periods, the mutual expectations throughout the notice period, clear details on financial outcomes of terminations and information regarding retirement.

If you are reading this policy and looking to leave Open Media, we are saddened that you want to leave but we want you to excel in your next challenge and as such we offer support to help you do this. We expect you to continue to do the right things, working up to your last day, and it matters to us that we end our time together on good terms.

Notice Periods

Your notice period is outlined in your contract of employment. This specifies both the notice that you we are required to give you, and the notice we require of you should you decide to leave.

Your employment may be terminated without notice where you have been summarily dismissed.

Working your Notice Periods

In all cases, Open Media reserves the right to require you to work your full notice period. In exceptional circumstances, we may agree to your request to reduce your notice period.

In some circumstances, if deemed appropriate and as an alternative to working your notice, the Company reserves the right either to transfer you to other suitable duties during your notice period or to require you to accept payment in lieu of any entitlement to notice.

We may ask you to use any remaining annual leave during your notice period.

Company Property

If you resign and are in possession of Company property (including any electronic files, material or intellectual property), you should make your manager aware and arrange how they will be handed back to us. You remain bound by the confidentiality arrangements outlined in your contract of employment during this period.

Other Conditions on Leaving

On leaving, Open Media will deduct from any money due to you such sums as you may owe to the Company. These may include, but are not restricted to, any loans, relocation assistance, court orders and payment made for holidays taken in excess of entitlement.

After you have left the Company, the post-termination restrictions outlined in your contract of employment will be in force, which include the restriction on soliciting or seeking to entice away any Company employees and divulging any confidential information.

Retirement

In line with current legislation Open Media does not have an age where it expects employees to retire. It is however our policy to have bi-annual appraisal meetings with all our team where they can discuss performance and any development needs, they may have, as well as their future aims and aspirations. Employees and their managers can also use this opportunity to discuss retirement planning should the employee wish to do so.

You should ensure that you inform your line manager at least 6 months before you plan to retire to ensure all appropriate arrangements are made and so that we can support you to make this transition.

Exit Interview

Your feedback is important to us, including when you are leaving. You will be offered an exit interview and we would appreciate your time to feedback on your time and experience with Open, and any recommendations you have for us to consider. The interview will cover:

- Your reasons for leaving further
- What you have enjoyed about the company
- Areas you believe Open Media can improve in
- An opportunity to feedback on your team
- Anything else you would like to discuss

These exit interviews aren’t compulsory so you can decline this, however we want to learn and grow as a company from your experience with us so would be grateful if were to take part.

Policy Review

This policy was published by Open Media in February 2025 and will be reviewed periodically on an annual basis.

Recruitment Policy



Introduction

Our people are what make Open Media and so attracting the best talent to join our team is critical to our ongoing success. We want to hire the right people at the right time and it's important to us that Open Media is a good fit for you, as much as you are a good fit for Open Media.

Policy Principles

This policy sets out our approach to the recruitment process and each element will uphold our principles.

It includes information about line manager responsibilities, job descriptions and employee specifications, assessment criteria, interviews (both remote and onsite) and equality, diversity and inclusion.

Line manager responsibilities

Line managers are responsible for recruitment in consultation with HR. A line manager who wishes to recruit someone must first obtain approval from the CEO. Where recruitment is planned to fill a vacancy created by a leaver, approval will normally be granted automatically.

If the line manager wishes to upgrade a role, or create a new role, they must provide the CEO with justification, focusing on organisational needs.

Assessment criteria

We always aim to recruit the person who is most suited to each particular job. We recruit solely on the basis of

the applicant's abilities and individual merit as measured against the predetermined criteria for the job. Qualifications, experience and skills are assessed at the level that is relevant to the job.

Job descriptions and employee specifications

Before initiating the recruitment process, the responsible line manager must ensure that there is an up-to-date job description for the role and a clear employee specification.

The job description will describe the duties, responsibilities, level of seniority associated with the role and pay and benefits, while the employee specification will describe the type of qualifications, training, knowledge, experience, skills, aptitudes, competencies and personal qualities required for effective performance of the job.

Advertisement of vacancies

It is our policy that all vacancies will be communicated internally. Line managers should encourage existing employees to apply for vacant posts if they have the appropriate qualifications, experience and skills.

For jobs we intend to advertise externally, managers and HR will work together to create the advert. We will use local job boards both online and offline to encourage applicants from our local communities. We will also consider different types of advertisements and ensure that our application processes are accessible to all.

HR is always available to provide guidance on reasonable adjustments.

Interviews

Line managers conducting recruitment interviews will ensure that the questions that they ask job applicants are not in any way discriminatory or unnecessarily intrusive. The interview will focus on the role and the skills needed to perform it effectively.

Line managers must make a record of every recruitment interview (using the interview assessment form) and share this with HR, to be retained for a relevant period. To ensure fairness, the line manager should ensure that questions asked are consistent in all interviews for a particular job. On no account should any job offer be made during or at the end of an interview.

In some cases, we will hold interviews remotely via telephone/online video call/online. Video interviews are normally carried out using Microsoft Teams. The responsible line manager should in advance provide the interviewee with details of how the interview will be conducted. They should also give the interviewee the opportunity to provide details of any reasonable adjustments that should be made or technological difficulties that they may encounter.

Psychometric testing

The CEO and HR must approve any request to use psychometric testing as part of the recruitment process. Any test used must have been validated in relation to the job, be free of bias, and be administered and validated by a suitably trained person. It is important to bear in

mind that the use of psychometric testing may not be appropriate or that such testing may need to be adjusted, for example where an applicant is neurodivergent or has requested reasonable adjustments to the recruitment process. In these circumstances, the line manager requesting such testing must refer to HR for further guidance.

Medical examinations

We never ask applicants to complete a health questionnaire or undergo a medical examination prior to making them a conditional or unconditional job offer.

References

We ask every successful candidate to give their consent for us to obtain two written references and to provide us with documentary proof of qualifications. Any offer of employment will be conditional on these requirements being satisfactory.

Right to work checks

We only recruit individuals with a legal right to work in the UK. All offers of employment will be subject to the candidate providing the required original documents or our organisation being able to carry out a check on the Home Office online right to work checking service confirming their right to do the work in question. To enable us to conduct an online check, the candidate must have shared their right to work details using the Home Office prove your right to work to an employer online service.

The requirement to provide evidence of the right to work in the UK applies to all new recruits, regardless of their race, nationality or ethnic or national origins.

Data protection

We process all personal data collected during the recruitment process in accordance with our Data protection policy / Processing special category personal data and criminal records data policy.

We do not collect unnecessary personal data from applicants during the recruitment process. For example, we will only request bank account details and next-of-kin contact details from successful applicants. Data collected as part of the recruitment process is held securely and accessed by, and disclosed to, individuals only for the purposes of managing the recruitment exercise effectively to decide to whom to offer the job. Staff should report immediately any inappropriate access or disclosure of job applicant data in accordance with our organisation’s data protection policy. It may also constitute a disciplinary offence, which will be dealt with under our organisation’s Disciplinary procedure.

Neonatal Care Leave & Pay Policy



Introduction

The Neonatal Care (Leave and Pay) Act 2023 was introduced in April 2025 to support parents of babies admitted into neonatal care.

The Company will do what it can to support parents through this difficult time.

Entitlement to Neonatal Care Leave (NCL)

Neonatal Care Leave applies to parents of babies who are admitted into neonatal care up to 28 days old and who have a continuous stay in hospital of 7 full days or longer.

Employees are entitled to take up to 12 weeks of leave in addition to other family leave entitlements such as maternity and paternity leave.

Eligibility

The right to Neonatal Leave is from day one of your employment.

In order to qualify for Neonatal leave (NCL) the following conditions must be met:

- You must be an employee
- The baby must be born on or after 6th April 2025
- At the birth of the baby, you must be the baby's parents, intended parents (in relation to surrogacy) or partner (see definition below) to the baby's mother and you must have or expect to have responsibility for raising the child.

- The newborn must be admitted to neonatal care within the first 28 days of birth and must remain in neonatal care for at least 7 continuous days. However, the first period of 7 days begins with the day after the day your baby first receives neonatal care which effectively means that the newborn must spend 8 days in neonatal care before you will become entitled to leave.
- Neonatal care leave must be taken to provide care for the baby.
- Neonatal care leave must be taken in blocks of a week.

Partner is defined as a person who lives with the baby's mother or adopter and is in an enduring family relationship with them but is not a relative (parent, grandparent, grandchild, sibling, aunt, uncle, niece or nephew).

How much leave and when this can be taken.

Parents can take one week's Neonatal Care Leave in respect of each uninterrupted week (7 days) that their baby receives neonatal care. The maximum amount of leave is 12 weeks.

The first qualifying period of 7 days begins with the day after the day your baby first receives neonatal care (i.e, days 2-8 of neonatal care). Neonatal care Leave can be taken from the day after the first qualifying period. This means that you are not able to start neonatal leave until day nine.

Leave must be taken within the first 68 weeks of the baby's birth (or placement in the case of adoption). As many people will already be on some form of family leave while their baby is in neonatal care, neonatal leave will often be taken after neonatal care has ended and at the end of maternity/paternity/shared parental or adoption leave.

However, there will be instances where individuals will take neonatal leave while their baby is still receiving neonatal care, for example partners whose paternity leave entitlement has run out while their baby is still receiving care.

There are two categories of neonatal leave depending on when the leave is taken, and these are referred to as Tier 1 or Tier 2 periods.

Tier 1 period leave applies to leave taken while your baby is still receiving care and up to a week after neonatal care ends. Tier 1 leave can be taken in non-continuous blocks of a minimum of one week at a time. The Tier 1 period leave ends on the 7th day after the day your baby stops receiving neonatal care.

Tier 2 period leave applies to leave taken more than 7 days after the neonatal care has ended and must be taken in one continuous block, there is no option to take more than one period of Neonatal Care Leave in the tier 2 period.

Notice to take Neonatal Care Leave

For each week of Tier 1 period leave (leave to be taken while your baby is still receiving care or within 7 days of neonatal care ending), notice must be given before you are due to start work on your first day of absence in that week unless it is not reasonably practicable in which case you must give as much notice as soon as it is reasonably practicable.

Notice during Tier 1 period leave does not need to be in writing although notice to receive Neonatal Care Pay for the same period will need to be in writing.

Tier 2 period leave

For a single week of Tier 2 period leave, notice must be given no later than 15 days before the first day the of the neonatal leave.

For two or more consecutive weeks of Tier 2 Leave, notice must be given no later than 28 days before the first day of the neonatal care leave to which the notice relates. The leave can only be taken in a single block.

Notice during Tier 2 period leave must be given in writing.

Entitlement to Neonatal Care Pay (NCP)

Neonatal Care Pay will be paid in accordance with the current weekly statutory rates or 90% of average weekly earnings, if this is less.

Neonatal Care Pay may be paid for a maximum of 12 weeks and is payable within the first 68 weeks of the child’s birth.

Eligibility

In order to qualify for Neonatal Care Pay (NCP), the following additional conditions must be met:

- You must have been employed for a continuous period of at least 26 weeks ending with the relevant week (which is the 15th week before the week in which the baby is due (approximately the 25th week of pregnancy)).
- Your average gross weekly earnings must be at least equal to the lower earnings limit for National Insurance (NI) purposes.
- As a general rule, your earnings will be averaged over a period of at least 8 weeks up to and including the last pay day before the end of the relevant week. This period is called the ‘relevant period’.

Notice for Neonatal Care Pay

The required length of notice differs depending on the period the pay relates to.

For each week of statutory pay beginning in Tier 1 period, notice must be given within 28 days from the first day of the period the notice relates to unless it is not possible to give this much notice, in which case notice must be given as soon as reasonably practicable.

For a single week of statutory pay beginning in the Tier 2 period, notice must be given no later than 15 days before the first day of the pay week which the notice relates to. This is the same as the corresponding notice requirements for Neonatal Care Leave.

For two or more consecutive statutory pay weeks beginning in the Tier 2 period, notice must be given no less than 28 days before the first day of the first week the notice relates to unless it is not possible to give this much notice, in which case notice must be given as soon as practicable. This is the same as the corresponding notice requirements for Neonatal Care Leave.

Internal Promotion Policy

Introduction

At Open Media, we are committed to the professional and personal development of our team and will always give existing employees preference for new roles while ensuring this is based on merit, qualifications, and business needs.

Internal Promotion

Your personal and professional development is evaluated at bi-annual intervals through the formal appraisal process.

You are encouraged to highlight any wishes or plans to further your skills, whether that be in your current role/ department or another area of business interest.

Where recruitment needs for roles senior to the one you occupy have been identified, your line manager will thoroughly consider the opportunity for you to be promoted into this role.

To be considered for promotion, you must typically:

- Be in good standing (no active disciplinary actions).
- Have held your current role for a minimum of 12 months (exceptions may apply).
- Meet or exceed performance expectations in your current role.
- Demonstrate the required skills and qualifications for the new role.

Lateral Career Moves

Open Media wishes to retain talent for as long as possible and through the formal appraisal process, encourages employees to make known their ambitions, including those outside of their existing roles or skill set.

Where an employee declares an interest in another area of the business, a career plan will be duly considered by the business and where practicable, the employee will be supported to make this move. This could include utilising your training fund, role shadowing or picking up work.

Retirement Policy



Introduction

Open Media will support every employee through their journey to retirement. We understand that preparing to retire can be daunting and we want to ensure that the transition from work to retirement is as smooth as possible for you.

Policy Principles

Our aim is to support you when you decide to retire, as best as we can. This policy sets out how we will do this and what you can expect from us.

Notifying us

You should give us notice in writing of your decision to retire. The amount of notice you need to give us is in line with your notice period in your contract of employment, however, we would encourage you do to do this as soon as you have made the decision, so that we can support you to prepare for retirement.

Phased retirement

Where possible, Open Media will support employees who wish to phase their retirement by reducing or changing their working hours or pattern in the weeks or months leading up to their retirement date. Open Media will endeavour to accommodate an employee’s request, although this may not always be possible.

Handover

We will agree a plan and framework with you, to ensure the best possible handover of your role and work. We may ask you to support us with the onboarding of a new starter if appropriate.

Pension

If you opted-in to a pension while at Open Media, our finance department can explain to you what will happen with this and any necessary steps you need to take.

Useful resources

We understand that retirement is a big life change both financially and personally, so we would encourage you to take advantage of external advice and support. Below are some free resources you may find useful:

British Heart Foundation:

<https://www.bhf.org.uk/informationsupport/heart-matters-magazine/wellbeing/retirement/retirement-tips>

Pension Wise:

<https://www.moneyhelper.org.uk/en/pensions-and-retirement/pension-wise>

Care Corner:

https://www.carecorner.org.sg/resource/seniors-feeling-lost-rediscovering-identity-in-aging-empowering-seniors/?gad_source=1&gad_campaignid=20661619344&gbraid=0AAAAADBdymwLChx-fOznl-ZI9OVrwG8TTB&gclid=Cj0KCQjwjJrCBhCXARIsAI5x66Xomz0DoGCdmaBGqExjKGzvnOVN2Hh2eE-Lo3HwRqUOTRw4RiU_krroaApliEALw_wcB

Complaints Process



<p>The Purpose</p> <p>This policy outlines Open Media’s formal process for handling complaints. It is designed to ensure that all stakeholders, including customers, suppliers, and community members, have clear and accessible channels to raise concerns. We aim to provide fair, timely, and consistent resolution of issues, in alignment with our commitment to ethical practices and the B Lab standards.</p> <p>Scope:</p> <p>This procedure applies to all external stakeholders that engage with Open Media. It is supplemented by our Code of Conduct and reviewed annually. Our internal stakeholders should refer to Open’s grievance policy which can be found in the Employee Handbook.</p> <p>1. Public Accessibility</p> <p>1.1. Public Complaints Submission</p> <p>Open Media provides a publicly accessible complaints form on its website to enable external stakeholders to raise concerns relating to the company and its operations. In addition to the form, stakeholders may submit complaints via email to the Operations Director.</p> <p>These channels ensure that all stakeholders including suppliers, clients, partners, and community members, are clear about how to raise a complaint.</p>	<p>This policy and a complaints form are publicly available on our website here.</p> <p>Stakeholders may raise concerns through:</p> <ul style="list-style-type: none">• Our Operations Director – Lauren Williams: lauren@openmedia.uk.com <p>1.2. Principles</p> <p>We encourage all stakeholders to raise any concerns as early as possible through the appropriate channel. Where suitable, informal resolution will be pursued.</p> <p>If informal resolution is not appropriate or unsuccessful, the concern may proceed to the formal complaints procedure.</p> <p>2. Raising a complaint</p> <p>2.1. Internal Stakeholders</p> <p>Internal complaints involving employment terms, HR issues, or internal conduct will be redirected to the relevant internal policies (e.g., Grievance Policy or HR procedures) and handled accordingly.</p> <p>2.2. External Stakeholders</p> <p>External stakeholders, including clients, suppliers, partners, and community members, may use this complaints process to raise concerns relating to their experience with Open Media, our conduct, or the impact of our operations.</p>	<p>Where an external complaint identifies misconduct by an Open Media employee, the matter will also be addressed through internal disciplinary procedures.</p> <p>3. Pathways to Resolve Concerns</p> <p>We encourage all stakeholders to raise their concerns through the channel above. In most cases, it is helpful to begin by raising the issue informally with the most appropriate point of contact (such as a line manager, customer service lead, or account manager).</p> <p>If informal discussion does not lead to a resolution or is not appropriate due to the nature of the issue, stakeholders are encouraged to submit a formal complaint.</p> <p>If you wish to resolve your complaint informally but the concern involves the individual you would normally communicate with or you feel uncomfortable raising it directly with them, you may escalate the matter to a member of the senior leadership team.</p> <p>In serious or complex cases, an external consultant or mediator may be appointed to investigate.</p> <p>We may invite you to a meeting to discuss the complaint and ask how you think it can be resolved. It may be necessary for us to make further enquiries and hold a second meeting.</p> <p>4. Complaints Process Transparency</p> <p>4.1. Information Provided to Stakeholders About the Complaints Process</p>	<p>4.1.1. Grounds for Accepting a Complaint</p> <p>A complaint will be accepted and subsequently investigated when it relates to:</p> <ul style="list-style-type: none">• The actions or behaviour of Open Media or anyone representing the company.• Failure to meet contractual, ethical, or professional obligations.• Conduct that negatively impacts clients, suppliers, or partners.• Concerns relating to fairness, transparency, or compliance with company policies or commitments.• Any issue where the stakeholder believes Open Media has not met expected standards. <p>4.1.2. A complaint will be accepted and subsequently followed up on Process Steps & Target Timelines</p> <p>Stakeholders submitting a complaint will receive clear information on:</p> <ul style="list-style-type: none">• Acknowledgement of the complaint within 5 working days.• An invite to an initial discussion or meeting to understand the issue.• Confirmation of the investigative steps to be taken, including interviews or evidence review.
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- Follow-up communication, including additional meetings where relevant.
- Target resolution timeline of 1 calendar month from the date of submission.
- Escalation route if the complainant is not satisfied (review by the CEO).

5. How a Resolution Will Be Facilitated

Open Media will work with the stakeholder to:

- Understand the desired outcome.
- Identify appropriate solutions (e.g., corrective action, mediation, process improvements).
- Communicate a written outcome with rationale.
- Implement agreed actions to prevent recurrence when possible.

6. Communication During the Complaint Process

6.1. Regular Communication & Outcome Notification

Open Media will communicate regularly with complainants regarding the progress of their complaint. This includes updates at each key stage of the investigation and confirmation once a resolution has been reached.

6.2. Explanation When an Issue Is Not Accepted as a Complaint

If an issue is not accepted as a formal complaint, for example, because it falls outside the policy scope, Open Media will provide the stakeholder with a clear written explanation and guidance on alternative routes for support or escalation.

7. Protection from Retaliation

Open Media strictly prohibits retaliation against any stakeholder who raises a grievance in good faith. All investigations will be conducted confidentially and sensitively.

8. Internal procedure(s)

If during the course of the investigation, it is found that an employee of Open Media is at fault, we can assure our stakeholders that we will handle this matter in accordance with our internal disciplinary processes. For reasons of confidentiality and our duty of care to the employee, external stakeholders will normally not be privy to the details of this, but we can assure you that we will deal with every substantiated complaint seriously.

9. Process review

This process was published by Helena Houghton-Casella on 28th November 2025 and will be reviewed on an annual basis.

Parental Leave



Introduction

Parental leave is a statutory right that allows parents to take time away from work to care for their child. It is designed to support families in balancing work and home life, and to enable parents to spend meaningful time with their children as they grow.

Policy Principles

We recognise the importance of family life and are committed to supporting employees in managing their work and caring responsibilities. Parental leave provides an opportunity for parents to take unpaid time off to care for their child at key stages of their development.

Eligibility and Entitlement

Parental leave is available to employees who:

- Are a parent of a child, or have parental responsibility
- Have responsibility for the upbringing of the child

You have a Day 1 right to unpaid parental leave, meaning there is no minimum length of service required to qualify.

The entitlement is:

- Up to 18 weeks’ unpaid leave per child
- To be taken at any time before the child reaches 18 years of age
- Available to both biological and adoptive parents

- For part-time employees, entitlement will be applied on a pro-rata basis.
- How Parental Leave Can Be Taken
- Parental leave should normally be taken:
- In blocks of one week, up to a maximum of 4 weeks per year per child

For parents of a disabled child:

- Leave may be taken in blocks of one day or more, up to a maximum of 4 weeks per year
- Notice Requirements
- You should provide at least 21 days’ notice of your intention to take parental leave, including the proposed start and end dates.
- We understand that circumstances can change and will aim to be as flexible as possible where this occurs.

During Parental Leave

During parental leave:

- Your employment will continue
- The leave is unpaid
- You remain bound by key terms such as good faith and confidentiality
- You are protected from detrimental treatment and unfair dismissal

Returning to Work

At the end of your parental leave:

- You will normally return to your same role
- If this is not reasonably practicable, you will be offered a role of similar or better status and terms

Postponement of Leave

- The Company reserves the right to postpone parental leave for up to 6 months where there are valid business reasons.
- However, leave will not be postponed where it is requested to take place immediately following the birth or adoption of a child.

Supporting You

We are committed to supporting you in balancing your work and family life. If you have any questions about parental leave or would like to discuss your options, please speak to your line manager or HR.