



Responsible Communication, Reputation and Online Conduct

THE DEFAMATION ACT 2013

We recognise and respect the right of customers, members of the public and other stakeholders to raise genuine concerns, express opinions and comment on matters that affect them.

However, there is an important distinction between **legitimate criticism or the reporting of a genuine concern** and the publication or repeated dissemination of statements that are knowingly false, misleading, malicious or presented as established fact when they have not been verified.

Online statements can have a significant impact on a small independent business. False or seriously misleading allegations may cause substantial reputational and financial harm, including loss of customers, performers, staff, suppliers and commercial opportunities. In serious circumstances, sustained and substantial financial or reputational damage could threaten the continued viability of the business.

Where statements concerning 100%Klub or its management are published or circulated, the company reserves the right to consider whether the circumstances give rise to potential legal remedies, including where appropriate matters relating to **defamation, malicious falsehood, harassment or other unlawful conduct**.

For clarity, this does not mean that the company will regard legitimate criticism, honest opinion, reasonable complaints or the responsible reporting of safeguarding concerns as unlawful.

We particularly ask that allegations concerning criminal conduct, safeguarding matters or the actions of individual people are not presented publicly as established facts unless they can properly be supported by reliable and appropriate evidence.

Where we become aware of potentially unlawful or seriously damaging material, we may preserve relevant evidence, seek professional or legal advice, request correction or removal where appropriate, and take such further action as may be reasonably available to the company.

We will always prefer concerns to be raised responsibly and, wherever possible, directly and privately so that they can be considered properly.

Our position is simple: genuine safeguarding concerns should always be heard and taken seriously, but allegations should not be turned into established facts through speculation, repetition or social media.