

SPEAKING UP POLICY

The Group is committed to maintaining a culture of integrity, transparency and trust by providing effective procedures for employees to “Speak Up”.

Policy Principles:

- Employees have a responsibility to Speak Up if they suspect any actual, planned or potential wrongdoing that breaches any law, regulation or Group standard.
- Employees will be encouraged to meet this responsibility by providing them with access to a confidential and secure means to raise legitimate concerns.
- Employees are expected to raise concerns through line management unless there is a good reason not to do so. In such circumstances the Group’s Speaking Up procedures will provide a process for reports to be made to a suitably independent internal function.
- All reports will be recorded, reviewed and, where appropriate, independently investigated. Feedback will be provided to the employee who has raised the concern.
- Where requested, every effort will be made to maintain the confidentiality of the employee making a report (although where, for example, the report leads to legal proceedings, this cannot be absolutely guaranteed).
- Unless a report has been made maliciously, no employee will be disadvantaged for Speaking Up.
- In exceptional circumstances, all employees retain the right to raise concerns directly with a relevant external body such as a regulator or external auditor. This would only be appropriate where it is in the public interest to do so, the employee believes internal channels cannot be used or have been exhausted, and where there is no unnecessary compromise of confidential information.
- The submission of malicious or deliberately misleading reports will be considered a serious breach of the Group Code of Conduct. It may also render the individual making the report subject to civil or criminal action.