Whistle Blowing Policy

[Name of Firm] takes wrongdoing seriously and if an employee has reasonable belief that one or more of the following has been, is being, or is likely to be committed, the matter must immediately be raised with Director’s Name:

1. a criminal offence (e.g. fraud, theft, bribery and corruption, money laundering)
2. a failure to comply with any legal obligation / the firm is breaking the law; or
3. a miscarriage of justice; or
4. the putting of the health and safety of any individual in danger; or
5. the risk of or actual damage to the environment ;or
6. deliberate concealment relating to any of (i) to (v) above

It is immaterial whether the relevant failure occurred, occurs or would occur in the United Kingdom or elsewhere, and whether the law applying to it is that of the United Kingdom or of any other country or territory.

All disclosures will be treated in confidence and every effort will be made not to reveal the identity of the person reporting the concern except where required by law.

Concerned members of staff will be supported and protected from reprisals. However, false and malicious allegations will be penalised.

If an employee feels the need to take advice before raising a matter they can contact the independent charity, Protect <https://protect-advice.org.uk/> on telephone number 020 3117 2520. They provide free, confidential legal advice on whistle blowing matters but there is no “gateway” to allow disclosure of any confidential information to them.

If employees believe that their concerns have not been properly addressed, they can contact the Financial Conduct Authority (FCA) on 020 7066 9200, by e-mail at whistle@fca.org.uk, in writing to Intelligence Department (ref PIDA) Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN of by completing an online form <https://fca.clue-webforms.co.uk/webform/fca/en> if they are concerned about something that is relevant to FCA’s functions.

Employees are protected by the Public Interest Disclosure Act where they:

1. have raised the matter internally with Director’s Name and remain concerned by the response or lack of response or they have felt unable to discuss the matter with them;
2. reasonably believe the information and allegations in it are substantially true;
3. reasonably believe the FCA is responsible for the issue in question.

The FCA would regard it as a serious matter if [Name of Firm] acted in a way that was detrimental to a whistle blower. Such evidence would call into question our fitness and propriety as a firm or the fitness and propriety of the relevant staff and could therefore affect our ability to continue to meet the FCA Threshold Condition 5 (Suitability) or for an approved person or a certification employee could affect their status as such.

Further information is available at [www.fca.org.uk/whistleblowing](http://www.fca.org.uk/whistleblowing) <https://www.fca.org.uk/firms/whistleblowing/speaking-fca>