

Whistleblowing Policy





Contents

Introduction.....	3
Who does this apply to?	3
What is whistleblowing?.....	4
How do I report my concerns?	4
Can I report anonymously?.....	5
How will my concerns be investigated?	6
What if I am not happy with the outcome?	6
External Disclosures.....	7
How am I protected if a make a disclosure?.....	7
Policy sign off.....	8
Need more info?	8
Ownership and Confidentiality	9

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Introduction

We are committed to conducting our business with honesty and integrity and we expect all colleagues to maintain high standards in accordance with our policies and procedures. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage our colleagues to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected
- To provide colleagues with guidance as to how to raise those concerns
- To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

Who does this apply to?

This policy applies to all colleagues across the Countrywide Group, including contractors and self-employed individuals in relation to service they provide the Company. It's a guide and doesn't form part of your contract.

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What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behaviour). This may include:

- A criminal offence, eg. Fraud
- Danger to the health and safety of any individual
- A risk or actual damage to the environment
- A miscarriage of justice
- A breach of any legal obligation
- A deliberate attempt to conceal wrongdoing

In order for any of these concerns to be raised as a Whistleblow, there is also the requirement for the concern to be in the public interest, i.e. it affects other people.

It is important not to confuse whistleblowing with a grievance, which would specifically relate to any personal complaints, including harassment, discrimination or anything else in relation to your employment. In those cases, you should refer to the Grievance Policy. If you are unsure, please mention this in your report and the HR team will be able to advise the correct process to follow.

How do I report my concerns?

You may be the first to know when someone inside or connected with the Company (or within the business of a third party, such as a client that you are working for): is doing something illegal or improper, but may feel apprehensive about voicing your concerns. This may be because you perceive that speaking up might be seen as disloyalty to colleagues or the Company itself; or it may be that you do not think that your concerns would be taken seriously. Be assured that the Company does not believe that it is in anyone's interest for you with knowledge of wrongdoing to remain silent.

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The matter or information reported under the policy may include sensitive or confidential information about the Company, its business, services, dealings, senior managers, colleagues, suppliers and contractors. Therefore, the Company has established a procedure for you to report such matters internally and if appropriate, externally, and it encourages the use of this procedure to raise any concerns.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You have no responsibility for investigating the matter - it is the Company's responsibility to ensure that an investigation takes place.

Reporting procedure

If you become aware of any wrongdoing of the type identified above you should report it confidentially to your manager, a Director or HR Services (hrsupport@countrywide.co.uk or 01908 961200) in the Countrywide Group of companies for which you work. You are encouraged to pursue the internal process in the first instance. Although, we do not expect you to have absolute proof of any misconduct or malpractice that you report, we will require you to provide details of the nature of the wrongdoing and as much information and supporting evidence as is available to you.

Alternatively, you may report the matter to the Company's external Whistleblowing Helpline service that is managed independently of Countrywide and who will maintain your confidentiality/anonymity if that is your preference via the following contact details:

Business hours telephone line: 0203 994 7185 *(please note, on occasion you may be asked to leave a voicemail)*

Once they receive your call, the details will be taken and passed to a senior leader within the business to be dealt with as above. We encourage you to provide as much information as possible, and where you feel able to, provide your contact details. The Company wherever possible will keep your identity confidential.

The appropriate individuals to whom you should report the wrongdoing will depend on the seriousness of the wrongdoing and who you think is involved. If you have cause to report suspected wrongdoing in accordance with this Policy, please make it clear to that person that you are advising them pursuant to this Policy.

In the event of public disclosure, no confidential information must be released.

Can I report anonymously?

We recognise that you may wish to raise concerns anonymously, however we do not encourage this as it makes

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a proper investigation more difficult if we are unable to contact you to obtain further information from you to establish whether the allegations are true.

Where possible we will keep your identity confidential. However, this would have to be weighed against any prejudice caused to any person against whom you have made the disclosure. As far as possible, we will deal with matters confidentially and we will expect you to exercise your discretion and keep these matters confidential as well.

How will my concerns be investigated?

It is likely that further investigation will be necessary and you may be required to make a formal statement or attend an investigatory meeting to explore the concerns further with you. Appropriate steps will be taken to ensure that your working environment and/or working relationships are not prejudiced by the fact that you have disclosed your concerns. All investigations will be carried out independently and the Company will ensure that if any managers are named in the disclosure that they are not involved in the investigation process.

The Company is required to undertake any actions that are identified as recommendations following an investigation, failure to complete these actions may result in disciplinary action being taken.

While the Company cannot guarantee that it will respond to your concerns in the way that you might wish, it will seek to handle the matter fairly and properly and will advise you as appropriate of the progress of the investigation and of decisions taken.

What if I am not happy with the outcome?

The investigation process and any decisions arising in relation to reported wrongdoing is a matter for the Company. However, if you are unhappy with the outcome of an investigation, you may submit a report to the Group's designated whistleblowing reporting officer (the plc Company Secretary- Gareth Williams email

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Gareth.williams@countrywide.co.uk) explaining why this is the case. Your concerns will be investigated as appropriate and the Company will report its findings back to you.

External Disclosures

In exceptional circumstances and as a last resort, you could make disclosures to other persons such as the police or regulators provided the disclosure is made in good faith, is not made for personal gain, is reasonable to make in all the circumstances and either the suspected wrongdoing is exceptionally serious, or you believe, on reasonable grounds, that:

- you will be victimised; or
- where the disclosure has already been made in accordance with the policy and ignored; or
- where there is no suitable prescribed person within the Company to whom internal disclosure can be made and disclosure to the employer may result in evidence of suspected wrongdoing being concealed.

It is not envisaged that these circumstances will arise, but if you think they do, you are urged to report your concerns to the Managing Director, or Director, or the Company's designated officer before disclosing externally. The Company appreciates every effort made to report concerns under this Whistleblowing policy and takes all matters relating to whistleblowing extremely seriously.

How am I protected if a make a disclosure?

If you make such a protected disclosure you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure.

Any confidentiality clause signed in connection with your employment will not prevent you from being able to make a disclosure.

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Change history

Version no	Date	Change made by	Brief details of change
1.0	01/03/2019	Claire Raines	Launch of New Policy
1.1	02/07/2019	Claire Raines	Change to Whistleblowing Hotline number
1.2	22/01/2020	Claire Raines	Insertion of details following audit
1.3	27/01/2021	Claire Raines	Annual Review

Policy sign off

Name	Role	Date
Dan Thompson	Group HR Director	01/03/2019

Need more info?

If there are any queries relating to this document or any of the local supporting policies or standards please contact the HR Services team (hrsupport@countrywide.co.uk or 01908 961200)

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Ownership and Confidentiality

This document should not be shared with any other third party without the written consent of Countrywide PLC. This policy and any associated documentation remains the property of Countrywide PLC and should be returned if requested.

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