



WHISTLEBLOWING POLICY

Introduction

We are committed to conducting our business with honesty and integrity and we expect all staff 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 carrying out illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage staff 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 staff with guidance as to how to raise those concerns
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken

Who does this policy apply to?

This policy applies to everyone who carries out work in the UK, including:

- Partners
- All employees
- Contractors and sub-contractors
- Consultants
- Work experience or other trainees

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:

- Breach of a legal requirement - e.g. health and safety obligations owed by the firm and/or an individual
- General malpractice - such as immoral, illegal or unethical conduct
- Gross misconduct
- Potential breach of the requirements in, or made under, the Financial Services and Markets Act 2000 (including FCA rules); The Pensions Act 2004, Proceeds of Crime Act 2002 or Bribery Act 2010
- Breach of the firm's independence policy
- Breach of audit (or other applicable) regulations
- Breach of the codes of conduct of all relevant professional institutions (including the Actuaries Code)

If you have any genuine concerns related to any of the above, you should report it under this policy.

Concerns in relation to money laundering or bribery should be referred directly to the Managing Director and not raised under this policy.

Protected disclosures

An individual making a "protected disclosure" is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

A "protected disclosure" is any disclosure of information which - in the reasonable belief of the individual making the disclosure - tends to show that one or more of the following has been committed, is being committed or is likely to be committed. The disclosure must be made in accordance with certain conditions - these conditions are less onerous if the disclosure is made internally:

- A criminal offence
- A failure to comply with any legal obligation
- A miscarriage of justice
- The putting of someone's health or safety in danger
- Damage to the environment
- Deliberate concealment of information relating to any of the above

It is immaterial whether the information is confidential and whether the incident occurred, occurs or would occur in the UK. A legal obligation can include a contractual or other civil obligation as well as an obligation under criminal law. Certain instances of wrongdoing as described above under "What is whistleblowing", for example breaches of codes of conduct of professional institutions, do not constitute a protected disclosure. You should seek advice if unsure on this point.

Raising a whistleblowing concern

All whistleblowing disclosures will be treated as confidential and will be reported to the Managing Director.

You should make it clear that you are making your disclosure within the terms of the firm's whistleblowing policy. This will ensure the recipient of the disclosure realises this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity. We will then get in touch with you to discuss your concern. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this. If you are not happy with the way in which your concern has been handled, you can raise it with the Managing Director.

Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. We do not encourage staff to raise concerns anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Managing Director and appropriate measures can be taken to preserve confidentiality. Anonymous concerns will nevertheless be taken seriously and investigated as fully as possible. The company is not accountable for maintaining anonymity where you have told others of the alleged misdemeanour.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff members that raise genuine concerns under this policy, even if they turn out to be mistaken.

Signature:



Date:

2-10-21

Harold Wylie

Managing Director