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# Whistleblowing Policy

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## Policy Control Framework

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### Document Review and Approval History

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### Associated Documents

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## 1 CONDUCT RISK STATEMENT

GRP is committed to conducting its business in a fair, honest and open manner. We seek to promote appropriate behaviour across all aspects of our business operations whilst ensuring fair and consistent outcomes for our customers. Our policies and procedures are designed to avoid engaging in any behaviour that could cause problems to consumers, market integrity or be anti-competitive.

In accordance with this, we will ensure that all individuals working within the business feel comfortable to raise concerns and challenge poor practices and behaviours.

## 2 DEFINITIONS

**Whistleblowing** - raising a concern about a wrong doing within an organisation. The concern must be a genuine concern about a crime, criminal offence, miscarriage of justice, dangers to health and safety or the environment – and the cover up of any of these.

## 3 APPLICABILITY AND SCOPE

This policy applies to all regulated entities within the GRP group of companies.

## 4 LEGAL/REGULATORY CONSIDERATIONS

### 4.1 Legal Requirements

The Public Interest Disclosure Act (PIDA) lists some of the activities that constitute misconduct or malpractice in the UK and would be reportable under the protection of Whistleblowing:

- Criminal offences
- Failure to comply with legal or regulatory obligations
- Actions which endanger the health or safety of staff or the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above

### 4.2 FCA Requirements

The FCA does not have specific rules on Whistleblowing for insurance intermediaries. However, Insurers are subject to specific rules from September 2016. They will need to:

- appoint a Senior Manager as their whistleblowers' champion - responsible for ensuring and overseeing the integrity, independence and effectiveness of the firm's whistleblowing policies and procedures - including those which protect whistleblowers from being victimised.
- put in place internal whistleblowing arrangements able to handle all types of disclosure from all types of person
- put text in settlement agreements explaining that workers have a legal right to blow the whistle
- tell UK-based employees about the FCA and PRA whistleblowing services
- present a report on whistleblowing to the board at least annually
- inform the FCA if it loses an employment tribunal with a whistleblower
- require its appointed representatives and tied agents to tell their UK-based employees about the FCA whistleblowing service

We will treat these rules as guidance on best practice and seek to implement within the business.

## 5 GROUP CONSIDERATIONS

The GRP group has appointed the General Counsel and Company Secretary as its Whistleblowers' champion.

## 6 POLICY

### 6.1 Our Assurances to You

We are committed to maintaining the highest standard of integrity, openness and accountability and recognise that you have an important role to play in achieving this goal.

Employees will usually be the first to know when someone inside or connected with an organisation is doing something illegal or improper, but often they feel apprehensive about voicing their concerns. This may be because they feel that speaking up would be disloyal to their colleagues or the organisation itself, or they do not think that their concerns will be taken seriously, or they are afraid that they might be bullied or dismissed. Our policy is that all illegal or improper acts should be reported by employees without fear of reprisals.

We take all malpractice or misconduct very seriously, whether it is committed by senior managers, staff, suppliers or contractors. This document sets out a procedure by which you can report your concerns.

Your attention is drawn to the specific policies in place relating to **Prevention of Financial Crime** and **Conflicts of Interest (including Gifts & Hospitality)**. If you are uncertain as to what course of action to take, you should discuss your concerns in the first instance the Compliance Officer.

### 6.2 What Sort of Activities Should I Report Using This Procedure?

You can report any activities that constitute misconduct or malpractice under PIDA: -

- Criminal offences
- Failure to comply with legal or regulatory obligations
- Actions which endanger the health or safety of staff or the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above
- Any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

We would also expect you to report the following:

- Financial mismanagement
- Insider dealing
- Harassment or discrimination
- Miscarriage of justice

It will not always be clear that a particular action falls within one of these categories and you will need to use your own judgment. However, we would prefer you to report your concerns rather than keep them to yourself. If you make a report in good faith then, even it is not confirmed by an investigation, your concern will be valued and appreciated and you will not be liable to disciplinary action. However, if you make a false report, maliciously or for personal gain, then you may face disciplinary action.

You can make a report orally or in writing. We would normally expect you to raise your concerns internally with:

- Your Line Manager or Managing Director.
- Human Resources/ Local Compliance Contact

However, if an individual has a particular grievance, concern, disclosure or information of a particular sensitive nature or has reasonable grounds to believe that the Company has committed a crime or breach of its legal obligation, a miscarriage of justice or a breach of health and safety or environmental legislation and the individual feels that reporting it to any of the above personnel is inappropriate, they should raise this with the GRP Group General Counsel (Whistleblowers' Champion) (020 3813 6904: Andrew.Hunter@grpgroup.co.uk) or the GRP Head of Compliance (0203 621 5836: Sarah.Pattni@grpgroup.co.uk).

If you would prefer to raise your concern with an Independent Non-Executive Director you can contact Lord David Hunt (lordhunt@dacbeachcroft.com).

### 6.3 External Contacts

While we hope that this policy gives you the reassurance you need to raise such matters internally, we recognise that there may be circumstances where you may consider that it may be appropriate to report your concerns to an outside body. If an individual believes that they are being penalised in any way for whistleblowing or that they consider that they have not had a satisfactory response to the disclosure made they should write to the FCA setting out the facts.

The FCA can be contacted as follows:

- Phone - 020 7066 9200
- Email - [whistle@fca.gov.uk](mailto:whistle@fca.gov.uk)
- Enforcement and Financial Crime Division (Ref PIDA), The Financial Conduct Authority, 25 The North Colonnade London E14 5HS

Further info is available at <http://www.fca.org.uk/site-info/contact/whistleblowing>

The FCA also suggests that individuals wishing to seek further advice on whistleblowing issues, should contact the following external body:

- Public Concern at Work 020 7404 6609 [www.pcaaw.co.uk](http://www.pcaaw.co.uk)

### 6.4 Do I Need Proof of Wrongdoing to Make My Report?

We do not expect you to have absolute proof of any misconduct or malpractice that you report. However, you will need to be able to show the reasons for your concern.

### 6.5 Will You Protect My Identity If I Make a Report?

We will do everything possible to keep your identity secret, if you so wish. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation or country laws require it) where this is not possible. Should this be the case we will discuss the matter with you at the earliest opportunity.

### 6.6 How Will My Report Be Investigated?

Once you have made a report, receipt of same will be acknowledged. There are, of course, two sides to every story and we will need to make preliminary enquiries to decide whether a full investigation is necessary. If such an investigation is necessary then, depending on the nature of the misconduct, your concerns will be either:

- Investigated internally (by management, internal audit, personnel); or
- Referred to the appropriate external person (for example our external auditors or the police) for investigation.

Subject to any legal constraints, we will inform you of the outcome of the preliminary enquiries, full investigation and any further action that has been taken. In the event that we lose an employment tribunal with a whistleblower we will inform the FCA.

## **7 TRAINING REQUIREMENT**

All staff are required to undertake an on-line training module that seeks to increase awareness of Whistleblowing.

For managers and those responsible for whistle-blowing systems and controls. Training should cover:

- how to recognise when there has been a disclosure of a reportable concern by a whistleblower
- how to protect whistleblowers and ensure their confidentiality is preserved
- how to provide feedback to a whistleblower, where appropriate
- steps to ensure fair treatment of any person accused of wrongdoing by a whistleblower
- how to assess and grade the significance of information provided by whistleblowers and
- sources of internal and external advice and support

## **8 CONDUCT RISK MANAGEMENT INFORMATION**

No specific management information will be reported under the policy. However, an annual report to the board will comment on the operation of the policy and on any cases lost before an employment tribunal where the claimant successfully based all or part of their claim on whistleblowing.

## **9 PROCEDURES**

This policy sets out the minimum standards that are to be complied with by all regulated subsidiaries of GRP. Each subsidiary may have their own bespoke procedures, however, they must as a minimum comply with and incorporate the requirements set out in this policy.