

		<b>GROUP</b>	
<b>Policy Name</b>	Whistleblowing Policy	<b>Date &amp; Issue</b>	19/11/18
<b>Approved</b>	<i>General Counsel &amp; Company Secretary</i>	<b>Doc. Ref. No.</b>	GRP-SE-POL-09

## 1. PURPOSE & SUMMARY

- 1.1 Countryside is committed to maintaining the highest standards of honesty, openness and accountability and recognises that its employees, workers and contractors have an important role to play in achieving this goal.
- 1.2 Staff will usually be the first to know when someone connected with a transaction is doing something illegal or improper, but may feel apprehensive about voicing their concerns. This may be because they feel that raising a concern is disloyal to their colleagues, that their concern may not be taken seriously or that they are afraid of any repercussions. Countryside does not believe that it is in anyone's interests for staff with knowledge of wrongdoing to remain silent and Countryside will give protection to those who raise a concern they genuinely believe is true with no disciplinary action being taken.
- 1.3 Countryside takes all malpractice very seriously, whether it is committed by its staff or anyone working on its behalf or capacity including (but not limited to) agents, contractors and external consultants. This document sets out a procedure by which you can report concerns to us.
- 1.4 The Whistleblowing Policy is maintained by the Countryside Compliance Officer (the Company Secretary). If you have any suggestions for improvement of the policy, please email [gary.whitaker@cpplc.com](mailto:gary.whitaker@cpplc.com).

## 2. WHAT SORT OF ACTIVITIES SHOULD BE REPORTED USING THIS PROCEDURE?

- 2.1 It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking, we would expect you to report the following under this policy:
  - criminal offences;
  - failure to comply with legal obligations;
  - miscarriages of justice;
  - actions which endanger the health or safety of staff or the public;
  - actions harmful to the business;
  - bribery (active bribery being offering, promising, giving; passive bribery being requesting, agreeing, accepting);
  - inappropriate/excessive gratuities;
  - ethical issues;
  - being requested to do something that may be deemed as inappropriate (such as falsify or conceal figures etc);
  - actions which cause damage to the environment;
  - actions of a fraudulent nature;

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- actions that offend, discriminate against or alienate any employees or business contacts; or
- email, internet and e-business abuse;
- actions which are intended to conceal any of the above.

2.2 It will not always be clear that a particular action falls within one of these categories and you will need to use your own judgement. However, Countryside would prefer you to report your concerns rather than keep them to yourself. If you have a personal grievance (e.g. a complaint relating to your conditions of employment, how you have been treated at work and/or your personal circumstances) these are not covered by this policy. Concerns of this nature should be raised in line with the Countryside Grievance Policy.

2.3 If you make a report which you genuinely believe to be true it will be valued and appreciated and you will not be liable of disciplinary action. However if you make a false report, maliciously or for personal gain, then you may face disciplinary action.

### **3. HOW TO REPORT A CONCERN**

We hope that in many cases you will be able to raise any concerns with your line manager (or his or her line manager).

However, where you prefer not to raise it with your line manager for any reason, you should contact one or more of the following:

- A member of the Senior Management Team
- Human Resources
- Group Company Secretary

Which of these individuals is most appropriate will depend on the seriousness of the malpractice and who you think is involved in it.

You can report a concern orally or in writing, e.g. letter or email and at any time, day or night.

### **4. EXTERNAL INDEPENDENT REPORTING HOTLINE**

We hope that staff will feel able to voice concerns openly under this policy. However if, for whatever reason, you cannot raise a concern internally you can contact our external independent confidential reporting line, Safecall.

Safecall provide a 24 hour a day, 7 day a week service via a Freefone number. When contacting Safecall you will be put in touch with an operator who is trained to receive reports about concerns in the workplace that you feel cannot be addressed in any other way. Your call will not be audio recorded and rest assured that calls received by Safecall will be treated confidentially. Should you wish, Safecall will guarantee your anonymity.



Safecall can also be contacted via the web at [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

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### **5. IS PROOF OF WRONGDOING REQUIRED IN ORDER TO REPORT?**

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

### **6. WILL THE GROUP PROTECT MY IDENTITY IF I MAKE A REPORT?**

Normally, the best way to raise a concern is to do so openly and Countryside would hope that you feel able to voice any concerns without the need to do so anonymously. Openness makes it easier for Countryside to assess and thoroughly investigate the concern. If you wish to raise a concern confidentially, or wish to give your name on the condition it is not revealed without your consent, please make this clear when making your report.

Every effort will be made to keep your details confidential, except where disclosure is required by law. If it is necessary for anyone investigating your concern to know your identity, it will be discussed with you first.

### **7. HOW WILL THE REPORT BE INVESTIGATED?**

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, Human Resources) 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.

### **8. WHAT CAN YOU DO IF YOU ARE UNHAPPY WITH THE WAY YOUR REPORT HAS BEEN DEALT WITH?**

If you are unhappy with the outcome of an investigation we would prefer that you submit another report explaining why this is the case. Your concern will be investigated again if there is good reason to do so.

### **9. EXTERNAL REPORT**

While we hope that this Policy gives you the reassurance you need to raise such matters internally, Countryside recognises that there may be circumstances (for example, where the wrongdoing is extremely serious) where it may be appropriate for you to report your concerns to an outside body, such as the police.

You are strongly advised to seek advice from one of the following before reporting your concern externally:

- Your line manager (or his or her manager)
- Human Resources
- Compliance Officer
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While we cannot guarantee that we will respond to your report in the way that you might wish, we will try to handle the matter fairly and properly. By using this procedure, you will help us to achieve this.

**Approved by the Board of Countryside Properties PLC on: 19 November 2018**