



**Policy:** Reporting and Whistleblowing Policy

**Author:** Head of Business Integrity

**Approver:** Chief Compliance Officer

**Effective date:** January 2010

**Revised:** April 2019

**Review due:** April 2020



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## **1 Whistleblowing and “Speak-Up” Culture**

- 1.1 Whistleblowing means the reporting by employees or others of suspected misconduct, illegal acts or failure to act within the organisation.
- 1.2 Crown Agents seeks to encourage and facilitate a “Speak-up” culture within the organisation in which employees and others who have concerns about ethical, compliance or safeguarding issues feel bound and empowered to voice them.
- 1.3 For Crown Agents, “Speak-up” culture means creating an environment to enable difficult conversations, encouraging dialogue both openly or in confidence, raising issues, concerns and observations, ensuring a platform to challenge the status quo and listening to the voices around us at every level of the organisation
- 1.4 Such issues, concerns and observations include but are not limited to:
- Conflicts of Interest (business, personal or political)
  - Corruption (bribery, facilitation payments, fraud, money laundering, theft, unethical business practices or use of company funds or assets)
  - Criminality (conduct which is an offence or breach of the law)
  - Environmental Policy issues
  - Gifts and Hospitality issues
  - Human Resources issues
  - Health and Safety issues
  - Legal issues
  - Political malpractice
  - Safeguarding (physical or verbal abuse, bullying, child protection)
  - Discrimination (on grounds of age, faith, gender or race)
  - Harassment, sexual exploitation or victimisation
  - Terror-related activity

## **2 Raising a Concern**

- 2.1 Crown Agents recognises that the decision to report a concern can be a difficult one and employees may be unsure whether their concerns should be reported or fear reprisals.
- 2.2 The aim of this policy is to promote a culture where concerns can be voiced in good faith in the knowledge that Crown Agents takes every concern seriously, investigates it fully and fairly and deals with it in an appropriate manner.
- 2.3 Reports can be made verbally or in writing via a number of different channels, all of which can be the first point of contact or whose involvement can be enlisted at any stage of the reporting and whistle-blowing process.
- 2.5 These channels include:
- Line Manager or Project Manager
  - Head of Business Integrity

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- Chief Compliance Officer
- HR Director
- CA Legal Counsel
- “The Ethical Line” (TEL)

2.6 The Ethical Line is operated by Expolink (<https://www.expolink.co.uk/whistleblowing-hotline/submit-a-report/>), an independent external company which specialises in operating confidential global telephone and e-mail reporting systems.

Telephone calls to TEL are free and its lines are open 24 hours a day, 7 days a week. Arrangements can be made for calls to be conducted in a wide range of languages. Calls to TEL can be made anonymously, if required. Guidance on using TEL and the relevant telephone numbers and e-mail address can be found on our website (<https://www.crownagents.com/who-we-are/business-integrity/speak-up-culture/>).

### 3 Protecting the Whistleblower

- 3.1 Crown Agents’ policy is to provide an environment in which concerns, issues and observations can be raised without fear of victimisation, discrimination, disadvantage or dismissal. Whistleblowing safeguards and undertakings are outlined below:
- 3.2 **Confidentiality** – Crown Agents will never reveal a whistleblower’s identity if the complainant specifies they do not want their name to be disclosed. However, should it become necessary to share details of the complainant with those under investigation, eg. in order to investigate the complaint or as part of evidence required for any civil or criminal proceedings, this will always be discussed with the whistle-blower in advance.
- 3.3 **Victimisation or Harassment** – Crown Agents will not tolerate harassment or victimisation and will take firm action to protect employees who raise a concern in good faith.
- 3.4 **Anonymous Reports** – Crown Agents encourages individuals to put their names to their whistleblowing reports, as concerns expressed anonymously are sometimes difficult to pursue if other attributable sources or evidence cannot be found. Crown Agents will always consider anonymous reports, but will consider:
- the seriousness of the issues raised
  - the credibility of the report and its anonymous reporter
  - the likelihood of obtaining confirmation of the allegations evidentially or from other attributable sources
- 3.5 Those making anonymous reports using TEL are urged to agree an arrangement, such as a ‘call back’ arrangement, through which they can be requested to provide more information on their concern, if required, to ensure that it can be fully investigated and pursued and through which they can receive feedback regarding their report.
- 3.6 **Untrue Allegations** – If a report is made in good faith, but is not confirmed by the investigation, no action will be taken against the reporter. If, however, allegations are found to have been made maliciously or vexatiously, the individuals concerned will, if

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employees, be liable to disciplinary action or, if business partners, to whatever sanction our contracts permit.

#### **4 Who is responsible for this policy**

- 4.1 The Chief Group Compliance Officer has overall responsibility for ensuring that this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 4.2 The Head of Business Integrity has primary and day-to-day responsibility for the implementation of this policy and will deal with queries on the policy’s interpretation.
- 4.3 Management at all levels within Crown Agents are charged by the Board that through their leadership and example they demonstrate their support of and commitment to the principles underlying this policy and to its implementation.

#### **5 Training and Communications**

- 5.1 The Business Integrity Unit will communicate this policy to Crown Agents employees through established internal communication channels and other training sessions including Business Integrity awareness sessions. HR will bring this policy to the attention of new employees as part of the induction process.

#### **6 Monitoring and Review**

- 6.1 The Head of Business Integrity will monitor the effectiveness and review the implementation of this policy, considering its suitability and effectiveness.
- 6.2 The Head of Business Integrity will report regularly to the Board on the effectiveness of the Reporting and Whistle-blowing Policy.

#### **7 Definitions**

Crown Agents	Means Crown Agents Limited, incorporated in England & Wales with registered number 3259922 and, where the context permits, any member of the Crown Agents Group
Crown Agents Group’	means Crown Agents and its subsidiaries
Employees	means all directors, officers and all employees (whether permanent, full- time, part-time, fixed term, ‘at will’ or temporary trainees, seconded staff, Crown Agents Group
Board	means the Board of Directors of Crown Agents
Chief Group Compliance Officer	means the individual designated by Crown Agents to hold the office of Chief Group Compliance Officer from time to time
Head of Business Integrity	means the individual designated by Crown Agents to hold the office of Head of Business Integrity from time to time
Speak-up Culture	creating an environment to enable difficult conversations, encouraging dialogue both openly or in confidence, raising

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issues, concerns and observations, ensuring a platform to challenge the status quo and listening to the voices around us at every level of the organisation

‘The Ethical Line’ or TEL means the independent confidential whistleblowing hotline operated for Crown Agents by Expolink

Whistle-blowing the reporting of suspected misconduct, illegal acts or failure within the organisation

Signature

Ian Malcolmson, Chief Compliance Officer