

Whistleblowing Policy

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Introduction

Purplebricks are committed to operating in a professional and ethical manner. All officers, directors, managers, supervisors, team leaders, employees, Licensed Business Partners, Local Property Experts, Local Lettings Experts and Territory Owners (for the purpose of this policy referred to as employee/licensed business partner and workers) are required to act in a professional and ethical manner. This includes respecting the laws of the countries in which the Company operates and promoting high standards of conduct and behaviour.

Scope

This policy applies to employees, Licensed Business Partners, Local Property Experts, Local Lettings Experts, Territory Owners, contractors and any person providing services to Purplebricks Group PLC whilst on Company premises or acting on behalf of the Company.

Policy

It is important to the business that any fraud, misconduct or wrongdoing by workers of the organisation is reported and properly dealt with. The Company therefore encourage all individuals engaged by the Company in any capacity to raise any concerns that they may have about the conduct of others in the business or the way in which the Company is run.

The Public Interest Disclosure Act 1998 (PIDA) gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so. The Public Interest Disclosure Act 1998 provides statutory protection to a worker who reasonably believe there has been:

- a criminal offence;
Examples; Theft in the workplace or illegal tax or accounting practices or claiming expenses fraudulently against the company
- a failure to comply with a legal obligation;
Example; a company not providing workers with statutory entitlements, such as maternity leave, or a failure to hold required insurance policies.
- a miscarriage of justice;
Example; a worker knows of an instance where someone has been convicted and punished for a person for a crime he or she did not commit.
- the endangering of an individual's health and safety;
Example; employees not provided with appropriate equipment carrying out their role, such as a company not issuing personal protective equipment (PPE) for production or manufacturing work.



- damage to the environment;
Example; disclosure relating to a company dumping of manufacturing waste in a river.
- a breach of any other legal obligation; or
- the deliberate concealment of information relating to any of the above.
Example; people within the Company taking steps to “cover up” instances of breaking the law.

The aim of this policy and procedure is to provide a framework for enabling our employees/licensed business partners or workers to raise concerns about malpractice in the workplace through a fair and discreet route. It must not be used for personal grievances which should be pursued through the Company’s Grievance Policy and Procedure.

Any concerns should be raised with the company using this Policy and Procedure. Employees/licensed business partners or workers should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if they have good reason to believe that evidence would be destroyed. Social media sites such as LinkedIn, YouTube, Facebook, Twitter and Instagram (this list is for illustrative purposes and should not be considered exhaustive) are public rather than private spaces and are not an appropriate channel for raising concerns. Disclosing confidential information on social media sites is a very serious matter and is likely to result in disciplinary action, up to and including summary termination from employment, immediate cessation of license agreement, removal from leadership/office or from their contractual arrangement.

Principles

- All companies face the risk of things going wrong or of unknowingly harbouring malpractice. The Company believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within the Company, we believe it can help prevent malpractice. All employees/licensed business partners or workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- The Company will treat any employee/licensed business partner or workers’ concerns seriously and act according to this policy and procedure. The matter will be investigated thoroughly and promptly. If the person asks for a matter to be treated in confidence, the Company will endeavour to respect their request, although anonymity cannot be guaranteed in all cases. If employees/licensed business partners or workers use this policy to raise a concern in good faith, the Company gives them its assurance that they will not suffer any form of retribution, victimisation or detriment. Victimisation of a person for raising a qualified disclosure will be a disciplinary offence.
- Malicious or vexatious allegations of criminal behaviour or other wrongdoings against the Company can have serious and detrimental effect upon work colleagues and the reputation of the Company. Any unwarranted allegations of criminal behaviour or other wrongdoings made in bad faith may be potential gross misconduct and will be dealt with in accordance with the Company’s Disciplinary Procedure for employees and could result in immediate cessation of license agreement, removal from leadership/office or from their contractual arrangements.
- If employees/licensed business partners or workers have difficulty putting their allegations in writing, or if English is not their first language, the Company will ensure that someone provides support or, if necessary, produces a written translation of their concern.
- An instruction to cover up wrongdoing is itself a potential disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a Manager, employees/licensed business partners or workers should not agree to remain silent. They should report the matter to a more senior manager or the People Team.



Procedure

1. How to raise concerns internally

a. Inform the line manager

An employee/licensed business partner or worker wishing to raise a concern should normally approach their direct line manager/principle contact in the first instance.

b. If an employee/licensed business partner or worker feels unable to tell their line manager

If an employee/licensed business partner or worker feels they cannot tell their line manager or principle contact, for whatever reason, they should raise the issue with their next level manager, another manager at the same level or the People Team.

c. If employees/licensed business partners or workers still have concerns

If an employee/licensed business partner or worker has raised their issue and still has concerns or the matter is so serious that they feel they cannot discuss it with either of the three persons referred to in section 1. b. above, they should raise the matter directly with a member of the Leadership Team or the Board.

2. How the Company will respond

After the employee/licensed business partner or worker has raised their concern the Company will decide how to respond in a responsible and appropriate manner under this policy and procedure. Usually this will involve a meeting with their line manager and People Team representative who may ask the worker to put their concerns in writing. This meeting will be held within a reasonable time of the matter being raised. It may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.

Following the meeting, the line manager (or other first contact) will make a preliminary assessment of the situation and its possible impact on the Company. They will brief a member of the Leadership team who will determine (depending on the severity of the alleged malpractice) whether to involve the Board.

As far as possible, the Company will keep the employee/licensed business partner or worker informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, the Company will not be able to inform employee/licensed business partner or worker of any matters which would infringe the duty of confidentiality owed to others.

3. Confidentiality

Every effort will be made to keep the identity of an employee/licensed business partner or worker who makes a disclosure under this policy confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, the employee/licensed business partner or worker will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential.

There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose the employee/licensed business partner or workers' identity. This may occur in connection with associated disciplinary or legal investigation or proceedings. If, in the Company's view such circumstances exist, it will make efforts to inform the employee/licensed business partner or worker that their identity is likely to be disclosed. If it is necessary for the employee/licensed business partner or worker to participate in an investigation, the fact that they made the original disclosure will, so far as is reasonably practicable, be kept confidential. It is likely, however, that the employee/licensed business partner or worker role as the whistle-blower could still become apparent to third parties during the course of an investigation.

4. Raising Employee/Licensed Business Partner or Workers' concerns externally (exceptional cases)

The main purpose of this policy and procedure is to give employees/licensed business partners or workers the opportunity and protection they need to raise their concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate action for employees/licensed business partners or workers to take. In most cases employees/licensed business partners or workers should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for an employee/licensed business partner or worker to report concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage employee/licensed business partner or worker to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are here: <http://www.pcaw.org.uk/contact-us>

Appeal Process

If the Whistle-blower is not satisfied that their concerns have been appropriately addressed, they can appeal against the outcome within 10 working days of the date of the outcome letter. Any appeal should be addressed to the People Team, who will appoint an independent manager to chair the appeal process.

Safeguards for Employees/Licensed Business Partners or Workers making a Disclosure

It is clearly established in law that the disclosure of confidential information in the public interest is a lawful act. Employees/licensed business partners or workers cannot therefore be disciplined for using this Procedure, provided that:

- Employees/licensed business partners or workers have followed the stages set down within it; and
- Employees/licensed business partners or workers have acted in good faith and not for personal gain, or out of personal motives.

The Company will ensure as far as possible that employees/licensed business partners or workers are not penalised for raising a legitimate concern under this procedure and that they are protected from reprisals by management or other employees. Any person who takes such retaliatory action will be subject to discipline, up to and including summary termination from employment, immediate cessation of license agreement, removal from leadership/office or from their contractual arrangement.

All reasonable attempts will be made to protect the confidentiality of the individual making the disclosure.

Further assistance for employees/licensed business partners or workers

The Company will not tolerate any form of bullying, harassment or victimisation of employees/licensed business partners or workers who make disclosures. If at any stage of this procedure an employee/licensed business partner or worker feels that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter, in writing, to the People Team.

Monitoring and review

This policy will be monitored periodically by the People Team and Senior Leaders to judge its effectiveness and will be updated in accordance with changes in the law. If changes are required, we will implement them.

This policy does not form part of any employee's contract of employment and may be amended at any time.

