

## Whistleblowing Policy

### Summary

- We're committed to the highest possible standards of openness, integrity and accountability and encourage all colleagues to raise serious concerns without fear of reprisal or victimisation.
- For the purposes of our policy "whistleblowing" is the disclosure of information in the public interest which you reasonably believe shows suspected or anticipated wrongdoing or dangers in relation to our activities - such as financial fraud.
- If you raise a genuine concern (even if later mistaken) under this policy, or if you participate in an investigation under this policy, you will not be subjected to any detrimental treatment.
- You may want to use the form designed for raising a concern under this policy, which is available on the intranet, but you don't have to.
- The PPF will process any personal data in accordance with GDPR and the data protection policy. All records will be destroyed in line with requirements under GDPR.
- If you are unsure whether to raise a matter under this policy or the Grievance Policy please seek advice from the Director of Compliance (Oli Beck) or the Chief Governance, Risk & Legal Officer (Dana Grey) in the first instance.
- From time to time, in our discretion, we may investigate concerns under this policy where they may not necessarily meet the requirements of "whistleblowing".

### Introduction

We're committed to the highest possible standards of openness, integrity and accountability and encourage all colleagues to disclose information relating to any suspected wrongdoing or dangers at work without fear of reprisal or victimisation.

This policy aims to make sure you:

- feel confident about raising genuine concerns about suspected or anticipated wrongdoing and acting upon your concerns;
- know there are appropriate avenues to raise your concerns;
- are given a response to your concerns and receive feedback on any action taken;
- are aware of how to continue pursuing the matter if you aren't satisfied with that response; and
- feel reassured you will be protected from reprisal or victimisation if you raise such genuine concerns.

This policy sets out:

- the procedure you should use to raise a concern;
- who to raise the concern with; and
- how we will investigate.

This policy covers all colleagues including employees, agency workers, secondees, interns, contractors and consultants. It also applies to suppliers and members of the public.

This policy records managerial processes. It does not form part of your contract of employment. The policy may be amended from time to time at the PPF's discretion.

## **The detail**

### ***What is whistleblowing?***

For the purposes of our policy "whistleblowing" is the disclosure of information in the public interest which you reasonably believe shows suspected or anticipated wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and breaches of legal or professional obligations.

A problem or grievance that is personal to only you is unlikely to count as being in the public interest or be reportable under this policy. Other mechanisms such as using the Speak Up toolkit, Grievance Policy or talking to your manager may be more appropriate. Therefore, we may instead decide to investigate matters raised under this policy under our Grievance Policy, or another process, where we consider it more appropriate to do so.

The sorts of issues raised under this policy include:

| <b>Examples of concerns which could be raised</b>            |   |
|--|---|
| Health and safety has been or is likely to be endangered.    | A criminal offence is likely to be or has been committed e.g. theft, bribery, fraud or financial misconduct.  |
| The environment has been or is likely to be damaged.         | There is a failure or likely to be a failure to comply with our legal obligations or regulatory requirements. |
| A miscarriage of justice has occurred or is likely to occur. | You believe someone is deliberately concealing or is likely to deliberately conceal any of these concerns.    |

### ***Principles***

- You don't need proof. If you have a genuine concern and reasonably consider you have information relating to the above types of concern, all you need to do is raise the issue to us.
- You don't have to investigate. It is our responsibility to do that.
- It may be something that has already happened, or is happening now, or you believe it is likely to happen in the future.
- It does not have to be in the UK. You can disclose information about something happening outside the UK.

### ***Protection***

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken. If you raise a genuine whistleblowing concern, you must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes being victimised, being given a formal warning, being dismissed or suffering any other disciplinary action or other unfavourable treatment because you have raised the concern. If you believe that you have suffered any such treatment, you should immediately inform the Chief Governance Risk

& Legal Officer OR Whistleblowing Champion. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

No one must threaten or retaliate against whistleblowers in any way. If anyone is involved in such conduct, they may be subject to disciplinary action which, if proven, could be subject to a sanction up to and including summary dismissal.

However, please note that the making of a deliberately false or malicious allegation is a serious matter and disciplinary action may be taken.

## **The process**

You can raise the concern verbally, in writing, or by email. You may want to use the form designed for raising a whistleblowing concern, which is available on the intranet, but you don't have to. In the flow chart below, we have outlined who you may wish to raise your concerns with.

We hope that our employees will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. If you wish to remain anonymous, then you can raise the issue by putting an unsigned written note in a plain envelope. No attempts will be made to determine who the anonymous whistleblower is. However, if this is the case, please remember that you must disclose full and factual information that you reasonably believe is in the public interest and tends to show one of the potential breaches we refer to above. A simple allegation, with no underlying evidence or information to be considered or investigated cannot be thoroughly investigated and is not a whistleblowing complaint.

### Investigation

Due to the size of our organisation we don't have an external whistleblowing reporting service. In most instances, whistleblowing investigations will be led or supported by the Compliance team to ensure confidentiality is maintained.

You should raise your concerns as soon as possible. Delaying could allow the incident to happen again or make it more difficult to investigate. When raising a concern, try to include as much information as possible on the nature of the concern. For example, when it happened, who was involved, the background and reasons for the concern. If you have already raised this as a concern, please confirm who this was raised with and the response received.

An appropriate investigator will carry out a thorough investigation while maintaining confidentiality as far as possible. The investigator may wish to hold a meeting with you to discuss your concern, and you may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

The Chair of the Risk and Audit Committee has been appointed as the PPF Whistleblowing Champion. They are responsible for reviewing any whistleblowing concerns raised in confidence and without interference, ensuring any investigation has been performed with appropriate follow up action and that employees who raise concerns are protected from detrimental treatment.

### Findings

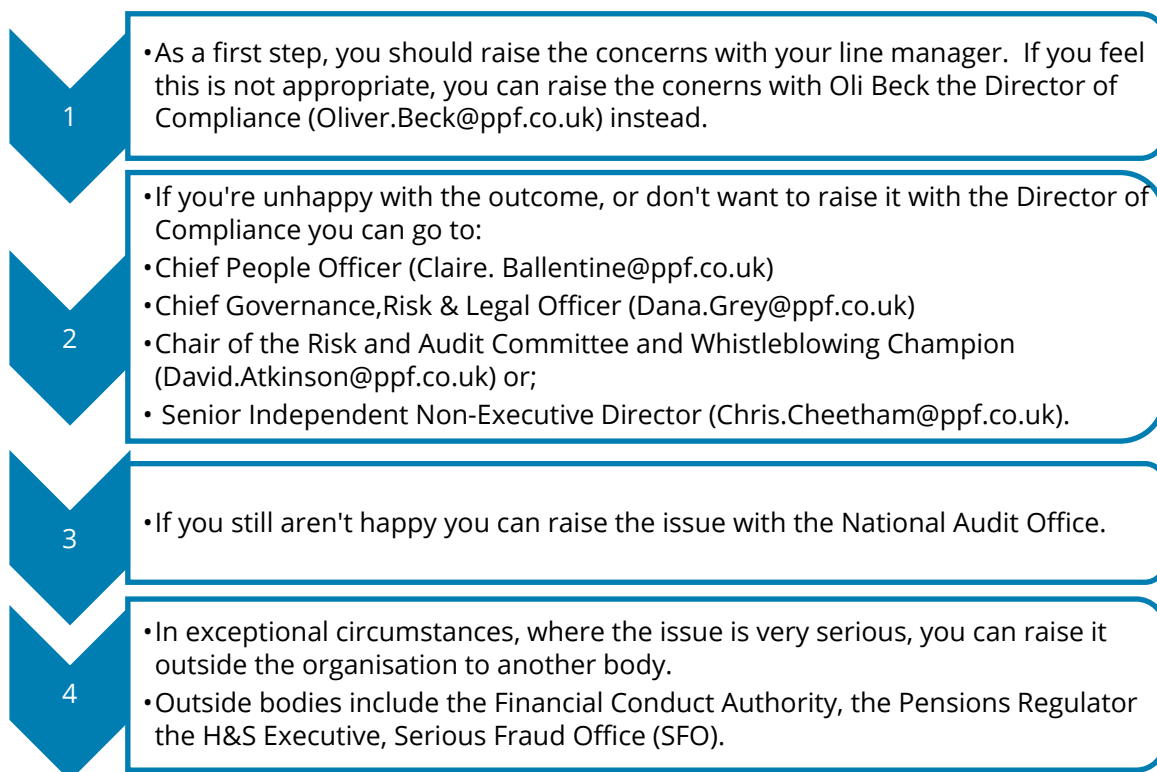
You'll be kept informed of the progress of the investigation and given feedback on the outcome and how to appeal. The investigator and decision maker may need to maintain confidentiality, so feedback might be general rather than specific.

We'll act on the investigation's findings where appropriate. If any misconduct is discovered, our disciplinary procedure and any appropriate external proceedings may be used to address the issue.

If you are dissatisfied with the outcome, you can escalate your concern further within the PPF as set out below.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or the police. We encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy. We have also included below the usual external bodies under which PPF falls within their remit.

### Who to raise the Whistleblowing Concerns with:



**Contact details**

| Title   | Name              | Contact  |
|---|-------------------|--|
| Director of Compliance                                      | Oli Beck          | <a href="mailto:Oliver.Beck@ppf.co.uk">Oliver.Beck@ppf.co.uk</a>             |
| <b>Other executive and non-executive directors:</b>         |                   |  |
| Chief People Officer  | Claire Ballentine | <a href="mailto:Claire.Ballentine@ppf.co.uk">Claire.Ballentine@ppf.co.uk</a> |
| Chief Governance, Risk & Legal Officer                      | Dana Grey         | <a href="mailto:Dana.Grey@ppf.co.uk">Dana.Grey@ppf.co.uk</a>                 |
| Chair of Risk and Audit Committee (Whistleblowing Champion) | David Atkinson    | <a href="mailto:David.Atkinson@ppf.co.uk">David.Atkinson@ppf.co.uk</a>       |
| Senior Independent Non-Executive Director                   | Chris Cheetham    | <a href="mailto:Chris.Cheetham@ppf.co.uk">Chris.Cheetham@ppf.co.uk</a>       |

**Other bodies include:**[National Audit Office](#)[Financial Conduct Authority](#)[The Pensions Regulator](#)[H&S Executive](#)**Data Protection**

The PPF will process any personal data collected via the investigation in accordance with the data protection policy. Data collected from the point at which you raise the concern is held securely, accessed by and disclosed to, individuals only for the purposes of dealing with the concerns raised as part of the investigation.

**Monitoring**

The Chief People Officer will provide high level stats to the Risk and Audit Committee detailing the numbers of concerns raised under the Whistleblowing Policy. No other information will be shared.

**Related documents/additional guidance**

The Whistleblowing Form can be found [here](#).

[Protect](#) is a whistleblowing organisation that provides a confidential free telephone advice service, to people who witness wrongdoing at work but aren't sure if or how to raise their concern.

The Gov.uk what is whistleblower guidance can be found [here](#).

**Document control**

|                  |   |
|------------------|---|
| Effective Date   | November 2025   |
| Version          | 1.0   |
| Reviewed By      | Dana Grey – Chief Governance, Risk and Legal Officer,<br>Claire Ballentine – Chief People Officer                   |
| Previous Version | Policy previously owned by HR, Compliance and Ethics have taken ownership of the policy from November 2025 onwards. |