



## **Whistleblowing Policy**

**October 2023**

## **1. Introduction**

- 1.1 Criminal behavior or wrongdoing by an employee, or any other person representing Libra Group, should be reported and dealt with appropriately.
- 1.2 Employees are often the first people who realize that there may be something seriously wrong within an organization but often do not express their concerns. This may be because they feel that speaking up would be disloyal to their colleagues or the Group, or fear that they may be victimized. They may feel that what may just be a suspicion of wrongdoing is not enough to justify reporting the matter, or it may seem easier to turn a blind eye.
- 1.3 This Policy aims to encourage and enable colleagues to raise serious concerns within the Group through approved channels, rather than overlooking a problem or raising the issue outside through unapproved routes.
- 1.4 This Whistleblowing Policy is underpinned by legislation on public interest disclosure and/or whistleblower acts and/or other relevant legal provisions applicable to the jurisdiction each employee is providing their services and/or is employed. Under this legislation, employees are legally protected from dismissal or unfavorable treatment by their employers as a result of raising concerns. No member of staff should feel at risk of retaliation or unfavorable treatment when raising legitimate concerns.
- 1.5 There are existing procedures in place to enable colleagues to raise general concerns relating to issues such as payroll problems, disciplinary issues, and working conditions. In addition, there is a grievance procedure to enable colleagues to complain if they feel they are not being treated correctly. The Whistleblowing policy has a wider application and is intended to cover any form of malpractice, including fraud, theft, and corruption. For the avoidance of doubt, the Whistleblowing service is not to be used to report personal or HR grievances and any person using the service must reasonably believe that it is in the public interest that they are doing so.

## **2. Aim and scope of the Whistleblowing Policy**

- 2.1 This Policy is founded on the principle that Libra Group and its employees should carry out their business and personal conduct in an ethical manner. This Policy is intended to cover concerns that fall outside the scope of the procedures described under section 3.
- 2.2 Under this policy, you are encouraged to make a report if you have a significant concern about any aspect of service provision, or the conduct of the organization's directors, managers, employees, consultants, contractors, or suppliers (or any other parties acting on behalf of Libra Group), past, current or potential, which in your reasonable belief may:
  - be unlawful
  - breach the Company's policies
  - breach established standards of practice
  - represent a failure to comply with a legal obligation
  - be a miscarriage of justice
  - endanger an individual's health and safety
  - cause damage to the environment

- 2.3 Deliberate concealment of information relating to any of the above can and should be reported under this Policy.
- 2.4 The Policy is intended to provide avenues for any employee to raise concerns (as specified in 2.2), receive feedback on the action taken, and gain reassurance that they will be protected from possible reprisals or victimization. The Policy also allows colleagues to take the matter further if they are dissatisfied with the organization's response to the concerns expressed (see Section 7).

### **3. Existing avenues for reporting concerns**

- 3.1 Employees may raise any concerns about the provision of services, or any unlawful activity occurring or thought to be occurring within the Group, through the appropriate specific procedure. Information regarding these procedures is available from the Employee Handbook and colleagues may talk to the Head of HR about their use.

### **4. Safeguards**

- 4.1 Libra Group recognizes that a decision to 'blow the whistle' can be a difficult one to make. This is likely to stem from fear of reprisal from the individual implicated, or from the Group as a whole. Libra will not tolerate any victimization and will take appropriate action to protect any person who raises a concern in good faith - including any necessary disciplinary action. If you have a concern, you can seek information and guidance with anonymity.
- 4.2 Wherever possible, the Group will protect the identity of any employee who raises a concern and who does not want his/her name disclosed. However, this may not always be possible, as any investigation process may in itself reveal the source of information and a statement by the Whistleblower may be a necessary part of the evidence.
- 4.3 Libra will protect individuals and the Group from false, malicious, or vexatious expressions of concern. Disciplinary action will be taken against any colleague who is discovered to have made allegations falsely and maliciously.
- 4.4 So long as any report is made in good faith even if the disclosure is found to be incorrect, provided that the whistleblower reasonably and truly believed to be accurate, they will not suffer any detriment.
- 4.5 Any concern that is sincerely felt and expressed may, on investigation, prove to be unfounded. The Group will try and ensure that the negative impact of either a false or unfounded allegation on any 'accused' person is minimized but acknowledges that it will not be possible to prevent all of the repercussions potentially involved.

5.1 Concerns should normally be initially raised with an appropriate level of line management (the immediate manager or their superiors). However, the most appropriate person to contact to report a concern will depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. Employees may therefore contact the following individuals where a report to a line manager is not possible or, if for whatever reason, the Whistleblower does not feel comfortable reporting to an immediate superior:

- Chief Governance and Sustainability Officer
- Chief Risk and Compliance Officer

5.2 Whilst colleagues will not be expected to prove the truth of an allegation that is made, it will be necessary to demonstrate to the person contacted that there are sufficient grounds for concern and the Whistleblower should be able to explain why they are making the disclosure and provide any relevant background documentation or information that may be available.

5.3 The Group recognizes the difficulty employees can have reporting to their work colleagues but would always recommend that one of the people listed in 5.1 above be contacted. However, there may be times when this isn't appropriate, or you would prefer to remain anonymous. To allow for this, the Group has provided a secure, [anonymous reporting route](#) operated by Navex Global, an independent third party. This service allows reports to be made 24 hours a day, 7 days a week via a dedicated link on the Group's own website. The information submitted via this route will be sent to the Chief Risk and Compliance Officer for further action.

## **6. Libra Group's response**

6.1 The action that will be taken by the Group will depend on the nature of the concern.

The matters raised will be investigated by management – or they may be subject to an independent inquiry. Relevant matters may also be subject to investigation by the police. However, in order to safeguard both the Group and individuals, initial enquiries will be made to determine whether the commitment of resources to any form of investigation would be appropriate. The initial inquiries will also help determine the most appropriate process for the consideration of the concern. Any necessary action that is required urgently will be carried out ahead of any assessment/investigation process.

6.2 Concerns or allegations raised which fall within the scope of specific established procedures will be referred for consideration under those procedures.

6.3 A referral of concern will be acknowledged, and an indication of how the Group proposes to deal with the matter will be given within 14 days. An indication of the likely timescales involved in providing a final response will also be provided. If it is not possible for initial inquiries to be completed within 14 days, the letter of acknowledgement will explain the situation. If a decision is made not to investigate, an explanation will be provided of the reasons for the decision.

6.4 Some issues may be investigated without the need for initial inquiries to be made.

Similarly, some concerns may be capable of resolution by agreed action without the need for investigation.

- 6.5 The level of contact between officers who will consider the issues and the colleague expressing the concern will depend on the nature of the matters raised, the potential difficulties involved as well as the clarity of the information provided. Further information may need to be sought from the person expressing the concern.
- 6.6 Libra will take appropriate steps to minimize any difficulties that a member of staff may experience as a result of using the Whistleblowing Policy.
- 6.7 The individual raising the concern will be given as much information as possible on the outcome of the investigation, subject to the constraints of the organization's duty of confidentiality or any other legal constraint. The objective of the various responses would be to ensure that a person expressing a legitimate concern can be assured that the matter has been addressed.

## **7. Taking the matter further**

- 7.1 The intention of the Policy is to provide an avenue for colleagues to raise matters within the Group, but also to provide an alternative channel for matters to be raised should any employee feel uncomfortable raising them internally.

## **8. Monitoring the Policy**

- 8.1 The Group will maintain a record of all matters raised through the Whistleblowing Policy in order that an assessment may be made of the effectiveness of the policy and any emerging patterns.