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Whistleblowing Policy

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Whistleblowing Policy

1. Purpose

London & Partners is committed to conducting its activities with honesty, integrity, and transparency. We expect all individuals working for or on our behalf to uphold the highest ethical standards. In line with this commitment, we recognise the importance of providing a safe and confidential mechanism for individuals to raise concerns about potential wrongdoing.

The aims of this policy are:

- Encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately.
- Provide clear guidance on how to raise concerns.
- Reassure individuals that they can raise genuine concerns without fear of reprisal, even if their concerns prove to be unfounded.
- Ensure that all reports of wrongdoing are dealt with fairly, impartially, and in a timely manner.
- Encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Scope

This policy applies to all:

- Employees (including permanent, fixed-term, and temporary staff)
- Board members
- Contractors
- Interns
- Volunteers
- Agency workers
- Any other individuals working for or on behalf of London & Partners

It covers concerns about wrongdoing at or by London & Partners. Concerns about an individual's own employment circumstances (e.g., grievances about bullying or harassment) should be raised through the appropriate grievance procedure.

3. Responsibilities

The Board of Directors: Is responsible for the overall oversight of this policy and for ensuring that adequate arrangements are in place for dealing with whistleblowing concerns.

Chief Executive Officer: Has overall responsibility for promoting a culture of openness and ensuring that concerns are addressed effectively.

Managing Director, Operations: Is responsible for the day-to-day operation of this policy, including:

- Receiving and acknowledging concerns.
- Overseeing investigations.
- Ensuring that whistleblowers are protected.
- Maintaining records of whistleblowing reports.

Managers: Are responsible for:

- Ensuring that their staff are aware of this policy.
- Taking appropriate action when a concern is raised with them.
- Cooperating fully with any investigations.
- Protecting whistleblowers from reprisal.

All Staff: Are responsible for:

- Being aware of this policy.
- Reporting any suspected wrongdoing in accordance with this policy.
- Cooperating fully with any investigations.
- Maintaining confidentiality.

4. Definition

Whistleblowing is the disclosure of information about suspected wrongdoing or serious concerns that are in the public interest. These may include, but are not limited to:

- Criminal offences
- Failure to comply with legal obligations
- Danger to health and safety
- Damage to the environment
- Miscarriage of justice
- Financial fraud or mismanagement
- Bribery and corruption
- Facilitation of tax evasion
- Breaches of the organisation's policies and procedures
- Abuse of power or authority
- Unethical conduct
- Deliberate concealment of any of the above

5. Protection for Whistleblowers

Protection is afforded to whistleblowers under the law (the Public Interest Disclosure Act 1998). In addition, London & Partners is committed to protecting whistleblowers from any form of reprisal or victimisation. This includes, but is not limited to:

- Dismissal
- Disciplinary action
- Demotion
- Suspension
- Harassment or intimidation
- Discrimination
- Negative performance appraisal
- Denial of training or promotion

Individuals who raise genuine concerns under this policy will not be penalised, even if their concerns are not upheld following an investigation. However, this protection does not extend to individuals who make false allegations maliciously or with personal gain in mind.

6. How to raise a concern

6.1 Raising a concern

Individuals are encouraged to raise concerns internally in the first instance. This can be done orally or in writing. Concerns should be raised with your line manager in the first instance. If you are unable to report the concern to your line manager then you can report it directly to the Director of People and Talent.

Where the matter is more serious, or you feel that your line manager has not addressed your concern, you should contact one of the following either verbally or in writing:

- Director of People and Talent
- Managing Director, Operations
- CEO

6.2 Confidentiality

All concerns will be treated with confidentiality, and the identity of the whistleblower will be protected to the extent possible, consistent with the need to conduct a thorough investigation and comply with any legal obligations.

6.3 Anonymous reporting

While individuals are encouraged to raise concerns openly, anonymous reports will be considered. However, it may be more difficult to investigate anonymous allegations effectively. Anonymous concerns can also be raised via our third-party confidential whistleblowing service, SeeHearSpeakUp. Further details on how to access this service can be found in Appendix A

6.4 External reporting

If an individual believes that their concern has not been adequately addressed internally, or if they have reason to fear reprisal, they may report the matter to our third-party confidential whistleblowing service. Further details on how to access this service can be found in Appendix A.

7. Investigation Process

All concerns raised under this policy will be taken seriously and promptly assessed. The Director, People & Talent or the Managing Director, Operations will be responsible for conducting an initial assessment to determine whether a formal investigation is necessary.

If a formal investigation is required, it will be conducted in a fair, thorough, and impartial manner.

The investigator will:

- Gather all relevant evidence.
- Interview the whistleblower and any individuals involved.
- Provide regular updates to the whistleblower, where appropriate and practicable.
- Prepare a written report of the findings.

The whistleblower will be informed of the outcome of the investigation, where appropriate and practicable, subject to any legal or confidentiality constraints.

8. Outcome and Follow-up

The findings of the investigation will be reported to the Managing Director, Operations or CEO.

Appropriate action will be taken to address any wrongdoing that is identified, which may include:

- Disciplinary action
- Changes to policies and procedures
- Referral to external authorities

9. If you are not satisfied with the outcome

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with either the Director of People and Talent, HR, Managing Director, Operations or the CEO. Alternatively, you may contact the [Chair of the L&P Board](#).

10. External Disclosures

The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert an external body e.g. a regulator.

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 ([click here for link to government website](#)).

It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals mentioned in section 6.2 for guidance.

11. Change History

Policy rewritten as part of Policy Refresh 2025.

12. Appendices

Appendix 1: SeeHearSpeakUp guidance

Strictly Private & Confidential

Helping to Protect and Enhance
the Reputation of
London & Partners

October 2022

LONDON

& PARTNERS



Whistleblowing Staff Guide

What is the purpose of the SeeHearSpeakUp Service?

SeeHearSpeakUp is a third-party independent company who provides you with the opportunity to expose unethical behaviour and other forms of wrongdoing and malpractice that you observe in your work-related activities. SeeHearSpeakUp specialises in implementing effective whistleblowing solutions to businesses in a safe, secure and supportive environment that encourages whistleblowers to speak up and be heard.

How do I use this service?

If you are aware of unethical behaviour or forms of malpractice you are encouraged to report internally within (Name of Company). However, there are other alternative safe and secure reporting options available to you if you would prefer to report the matter to SeeHearSpeakUp. These include:

⊕ By completing an online web report via the [SeeHearSpeakUp](https://www.seehearspeakup.co.uk/file-a-concern) website - www.seehearspeakup.co.uk/file-a-concern.

⊕ By ringing your International Toll-free number (ITFN) in the country you are based -

UK	0800 056 2539	USA	1855 290 6405
China	400 120 2442	India	000 800 1009 229
France	0800 918 045	Spain	800 600 953
Germany	0800 000 8875		

Important: Calls to ITFN numbers in most countries are free from landlines. Please note that mobile access in some global regions may not be fully supported and that charges may be incurred to the caller based on their individual telephone subscription.

What happens when I ring the designated helpline number?

When you make contact through SeeHearSpeakUp's designated telephone service, you will speak with a specialised call handler who will ask you for some information, document your feedback and ask follow-up questions to clarify information. The call handler will then prepare a report of your concern to be sent to your employers senior company representative who will be responsible for determining what course of action is to be taken, such as a formal investigation into the matter.

Who are SeeHearSpeakUp specialised call handlers?

SeeHearSpeakUp specialised call handlers answer all calls received through your designated telephone number. SeeHearSpeakUp specialised call handlers are professionally trained. They have a broad and extensive interviewing background and will gather information from you in a discreet, sensitive, and empathetic manner.

Can I report anonymously?

Yes, you can raise reports anonymously. SeeHearSpeakUp will only share your personal information with those appointed in your organisation to investigate your report where you have provided consent to do so. Please note that your report is likely to be investigated more effectively if you consent to share your personal information with your organisation.

How can you guarantee anonymity?

When calling SeeHearSpeakUp to raise your report or if you choose to raise an online report you will be provided with a Personal Identification Code. As a result, we have no means of identifying you unless you volunteer your contact details. The Personal Identification Code, which is unique to your report, can be quoted by you should you wish to phone SeeHearSpeakUp again in the future to check for any feedback that London & Partners has provided or should you wish to provide additional information pertaining to your original report.

Does SeeHearSpeakUp offer language support?

Yes, the SeeHearSpeakUp online web reporting platform (see page one) allows you to submit your report in a choice of over 30 languages.

SeeHearSpeakUp operate globally and use interpreting services to assist with multi-language communications. All calls will initially be connected to an English-Speaking operator who will connect an interpreter to the telephone line to assist in any interpretation requirements. If you wish to arrange for a SeeHearSpeakUp call handler to call you directly at a mutually agreed time with the aid of an interpreter, please email us at report@seehearspeakup.co.uk to arrange an appointment.¹

How long does it take my employer to investigate my report and provide me with feedback?

This is dependent on the nature and complexity of the information provided. However, all reports received are treated seriously and will be diligently followed up by London & Partners.

How do I receive feedback on my report?

If you have provided consent to share your contact information with London & Partners then they may contact you directly to provide you with feedback on your report. If you have elected to remain fully anonymous you are encouraged to contact SeeHearSpeakUp via the reporting channels available to you (see page 1) to seek feedback quoting your Personal Identification Code.

Can I call SeeHearSpeakUp to seek legal advice or advice on my company policy?

The specialised call handler will not be able to answer questions about your company's policy and cannot advise you on any legal course of action you should take. However, they will be able to document your request for information or advice in a report to be sent to your company.

¹ Note: Interpretation support is based on service demand and is therefore subject to interpretation availability.

Are telephone calls recorded?

No calls are recorded by SeeHearSpeakUp. However, the key details of the conversation is noted by the SeeHearSpeakUp call handler who takes the call.

When can I make calls through this service?

The external helpline is operated 24 hours a day and 365 days a year. It is preferable that a concern is raised as soon as possible or as soon as you have a reasonable suspicion. You are not expected to investigate the matter yourself or to prove that your concern is well-founded.