



# Freedom to Speak Up: Whistleblowing Policy

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## **PURPOSE**

This policy outlines the procedures through which you can raise concerns about potentially serious incidents of malpractice or wrongdoing by GoCo Group PLC (GoCo) its employees, agents and partners.

## **INTRODUCTION**

Across GoCo, we are committed to the highest possible standards of openness and accountability and this is an essential part of our culture. In line with this, if you have any genuine concerns about, or discover information that you believe gives rise to any genuine concern of serious malpractice, wrongdoing or poor behaviour you are encouraged to speak out without fear of reprisal. This policy outlines how you can raise concerns internally and, if necessary, independently of line management (sometimes called 'whistleblowing').

Following this policy will ensure that your concerns are investigated appropriately and action is taken to resolve matters fairly. It is important to be aware that this policy does not replace the Grievance Procedure and if you have a complaint to make about your treatment at work, you should consider if this would be best dealt with through the Grievance Procedure.

In addition to the commitment of openness and accountability, in certain circumstances, you may be further protected by the Public Interest Disclosure Act 1998 (PIDA), which provides legal protection to employees against being dismissed or otherwise penalised by their employers as a result of speaking out and disclosing particular concerns. Please see further below.

## **SCOPE**

This policy applies to all staff, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, sub-contractors, trainees, seconded staff, home-workers, part-time and fixed term workers, casual and seasonal workers as well as third parties who act for or on our behalf.

All employees, officers and anyone performing services for or on our behalf must comply with this Policy. Failure to comply in every respect could lead to disciplinary action up to and including termination as well as contractual and criminal offences.

This policy is designed to work in conjunction with our Conflicts of Interest Policy, Anti-Bribery Policy and our Anti-slavery and Human Trafficking Policy.

## **POLICY**

This policy is designed to enable you to raise genuine concerns about anything you consider shows serious malpractice, wrongdoing, or poor behaviour. These could be about:

- improper conduct or unethical behaviour (including conduct which is contrary to our commitment to the fair treatment of customers)

- criminal activity
- failure to comply with legal obligations
- financial irregularity, fraud, dishonesty or malpractice
- dangers to health & safety
- the offering or receiving of a bribe as a reward or incentive to act improperly
- deprivation of a person's liberty by another to exploit them for personal or commercial gain (slavery, servitude, forced and compulsory labour and human trafficking)
- deliberate systemic breaches of policies or procedures
- attempts to conceal any of these.

Any dealings with Third Party Suppliers, whether as part of procurement or during the ordinary course of business, are deemed to be high risk and more likely to be an area which could give rise to invoking this policy.

If you have a genuine concern, which you think should be investigated, please use this policy. If, however, you wish to make a complaint about your employment or how you have been treated, please use our grievance policy or harassment and bullying policies. If you have concerns about customer or claimant fraud please refer to the Financial Crime Policy.

This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, staff or the organisation itself.

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

## **INTERNAL PROCEDURES FOR MAKING A DISCLOSURE**

Any concern you have about a workplace situation should, in usual circumstances, initially be raised with your line manager. However, due to the potential seriousness and likely sensitivity of some issues, this could be difficult or even impossible for you. In these cases, there are a number of ways in which you can report your concerns. These include speaking to:

- your department Director
- VP of People and Talent
- Risk and Compliance Director
- VP of Governance
- General Counsel & Company Secretary

## **SPEAKING ON SUSPICION**

Sometimes, you may feel reticent about raising concerns. If you have a genuine concern and do not wish to approach management directly, or wish to report your concern anonymously, then you can feel comfortable that you can use the external confidential whistleblowing phone line.

The Whistleblowing line is managed by the independent charity Protect. Their contact details are:

**Call:** 020 3117 2520

**Email:** [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

The advice line is open Monday-Friday, 9am-6pm and managed by qualified lawyers who can talk you through your options and help you raise a concern about malpractice at work.

## **CONFIDENTIALITY AND INVESTIGATION**

Completely anonymous disclosures are difficult to investigate. If, however, 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. Please note in some circumstances information may need to be passed to external bodies for further investigation and anonymity can sometimes not be guaranteed.

Appropriate concerns raised in accordance with this policy will be investigated thoroughly and in a timely manner and will be overseen by the Chair of the Audit and Risk Committee. Senior staff not associated with the initial concern and who possess the appropriate seniority, skills and expertise will manage the investigation.

Due to the varied and often complex nature of these sorts of disclosures, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for such investigations. The person making the disclosure will usually be informed of the outcome. However, there may be situations where this may not be the case.

## **THE PUBLIC INTEREST DISCLOSURE ACT 1998 (PIDA)**

PIDA provides legal protection to employees against being dismissed or otherwise penalised by their employers as a result of disclosing certain serious concerns. It is important to be aware that, for you to gain this protection, the concern you raise must normally be made first to GoCo, be deemed in the public interest and there must be a reasonable belief that the issue of concern tends to show malpractice or impropriety.

## **ALTERNATIVE REPORTING METHODS**

If your concern relates to GoCompare.com Limited and you are uncomfortable reporting using the methods above then you can also contact the Financial Conduct Authority.

- Call: +44 (0)20 7066 9200 during office hours or leave a message
- Email: [whistle@fca.org.uk](mailto:whistle@fca.org.uk)
- Write to: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN

## **GOCOMPARE GROUP COMMITMENT**

We understand the difficult choice you may have in raising a concern. The GoCo Board of Directors have made a commitment to treat all issues raised under this policy seriously and will

make certain that if you raise a concern, you are not victimised or subject to any reprisal, provided the disclosure is made in accordance with this policy. However, if we conclude that you have made false allegations maliciously or with a view to personally gain, you may be subject to disciplinary action which may include dismissal.

## **MONITORING & REVIEW**

The GoCo Group Compliance department will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

The GoCo Group Compliance department will conduct periodic monitoring of this policy, which will aim to make an independent assessment of the adequacy of the policy and the effectiveness of its operation. It will routinely report the results of this process to the Executive and escalate any material non-compliance where necessary.