

1. Policy Statement

- 1.1 It is the Policy of the Castor Vali Group to conduct its business with honesty and integrity in all circumstances. Castor Vali expects its entire staff to maintain high standards of behaviour in all areas in accordance with our Code of Conduct.
- 1.2 Castor Vali acknowledges that all organisations face the risk of circumstances going awry, or can unknowingly be harbouring illegal or unethical conduct. Accordingly, a culture of openness and accountability is promoted throughout Castor Vali. This is imperative to prevent the likelihood of such situations occurring, and to address any issues that do occur.
- 1.3 As such, Castor Vali has implemented a Whistleblowing Policy which is available to every staff member and subcontractor on request, and also via the Castor Vali shared network.
- 1.4 The aims of this Policy are:
 - a) to encourage staff to report suspected wrongdoing as soon as possible, whilst remaining secure in the knowledge that their concerns will be taken seriously, investigated as appropriate, and that their confidentiality will be respected;
 - b) to provide staff with guidance as to how to raise those concerns; and
 - c) to reassure staff that they are able to raise genuine concerns in good faith without fear of reprisal, even if the claim is deemed to be mistaken.
- 1.5 This Policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Who is covered by this Policy?

- 2.1 This Policy applies to all individuals working at all levels of the organisation including; directors, senior managers, officers, employees, consultants, subcontractors, trainees, interns, part-time employees and temporary agency employees (together "staff").

3. What is Whistleblowing?

- 3.1 Whistleblowing is the disclosure of information that relates to suspected wrongdoing on the part of both staff members and clients.
- 3.2 This may include:
 - a) criminal activity;
 - b) miscarriages of justice;
 - c) danger to health and safety;
 - d) damage to the environment;

- e) failure to comply with any legal or professional obligation, or regulatory requirements;
- f) bribery;
- g) financial fraud or mismanagement of funds;
- h) money laundering;
- i) negligence;
- j) breach of internal policies and procedures to include the Code of Conduct and Ethics;
- k) conduct likely to damage Castor Vali's reputation;
- l) unauthorised disclosure of confidential information;
- m) unauthorised personal investment into a commercial or residential property;
- n) the deliberate concealment of any of the above matters; and
- o) any other matters which are relevant to the functions of the FCA.

3.3 A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. All staff members are required to report such concerns under this Policy.

3.4 This Policy should not be used for complaints relating to own personal circumstances, such as an individual's treatment in the workplace.

3.5 If a member of staff is uncertain whether a matter falls within the scope of this Policy they should seek advice from the Chief Operating Officer (contact details at the end of this policy document).

4. Raising a Whistleblowing Concern

4.1 Castor Vali would prefer in the first instance, for the majority of situations, that members of staff raise concerns with their Line Manager; either in person or in writing. This way, the matter may be resolved quickly and effectively. In more complicated cases, the Line Manager may refer the matter to the Chief Operating Officer.

4.2 Where the matter is more serious, or a member of staff feels that their Line Manager has not addressed their concern, or prefers not to raise it with their Line Manager for any reason, one of the following parties can be contacted:

- Castor Vali's Chief Operating Officer; or
- Castor Vali's Group Managing Director (contact details at the end of this policy document).

4.3 Castor Vali will arrange a meeting with the staff member as soon as possible to discuss any matters of concern. He/she may bring a colleague to any such meeting under this Policy.

4.4 A written summary of the concern will be recorded and will be provided to the staff member. Castor Vali will aim to give such individual an indication of the proposed manner in which the matter will be dealt with.

5. Confidentiality

- 5.1 It is intended that all members of staff will feel able to voice whistleblowing concerns openly under this Policy. However, if a staff member wants to raise a concern confidentially, Castor Vali will make every effort to keep the said member of staff's identity undisclosed. If it is necessary for anyone investigating a concern to know a member of staff's identity, it will be discussed with the staff member before any such disclosure is made.
- 5.2 Staff members are not encouraged to make disclosures anonymously. A proper investigation may be hindered if further information cannot be obtained or is not forthcoming from a member of staff. It is also more difficult to establish whether any allegations are credible and have been made in good faith.
- 5.3 Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to their Line Manager or one of the other contact points listed in paragraph 4.2, and appropriate measures can then be taken to preserve a staff member's confidentiality.

6. External Disclosures

- 6.1 This Policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. Castor Vali believes that in most cases, staff should not find it necessary to alert anyone externally.
- 6.2 The law recognises that in some circumstances it may be appropriate for a member of staff to report any concerns to an external body such as the National Crime Agency ("NCA"). Castor Vali strongly encourages its staff to seek advice internally before reporting a concern to anyone external.
- 6.3 Alternatively, 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 at the end of this Policy document.
- 6.4 Whistleblowing concerns usually relate to the conduct of fellow staff members, but they may sometimes relate to the actions of a third party, for example, a client, supplier, or other business contacts. The law allows for concerns to be raised in good faith with a third party, where it is reasonably believed that the matter relates mainly to a third party's actions or legal responsibility.

7. Investigation and Outcome

- 7.1 Once a concern has been raised, an initial assessment to determine the scope of an investigation into the matter will be carried out. The staff member will be informed of the outcome of any assessment and may be required to attend additional meetings to provide further information.

- 7.2 In some cases, an investigator, or team of investigators, may be appointed to adjudicate the matter. This team may include other members of staff with relevant experience in investigations or specialist knowledge of the subject matter. The investigator(s) may also make recommendations that enable Castor Vali to minimise the risk of further wrongdoing in the future.
- 7.3 The whistleblower will be kept informed of the progress of any investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the disclosure of specific details of the investigation or any disciplinary action taken as a result. Any such information disclosed about the investigation must be treated as highly confidential.
- 7.4 If it is concluded that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.
- 7.5 Records of investigations will be kept for future reference and will be kept confidential at all times. The individuals listed in paragraph 4.2 hold overall responsibility for recording keeping in relation to investigations.

8. Dissatisfaction with a Verdict

- 8.1 If a member of staff is dissatisfied with how a concern has been handled, it can be raised with one of the other key contacts, outlined in paragraph 4.2. Their contact details are set out at the end of this Policy document.

9. Protection and Support for Whistleblowers

- 9.1 Staff who are concerned about any possible repercussions of making a whistleblowing report must be assured that Castor Vali aims to encourage openness and will support members of staff who raise genuine concerns in good faith under this Policy, even if they are mistaken.
- 9.2 Members of staff will not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that he or she has suffered any such treatment, their Line Manager must be informed immediately. If the matter is not remedied it should be raised formally with the Chief Operating Officer.
- 9.3 Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

10. Responsibility & Policy Review

Whistleblowing Policy

CASTOR VALI

- 10.1 The management of Castor Vali Ltd and its Appointed Representatives (together “Senior Management”) has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy.
- 10.2 The Chief Operating Officer has day-to-day operational responsibility for this Policy and must ensure that all line managers and other staff who may deal with concerns or investigations under this Policy receive appropriate training.
- 10.3 All members of staff are responsible for the success of this Policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

11. Contact Details

11.1 Internal Contact Details

| Name | Job Title | Email |
|------------------|-------------------------|---------------------------------|
| Lawrence Clinton | Chief Operating Officer | lawrence.clinton@castorvali.com |
| Steve Grant | Group Managing Director | steve.grant@castorvali.com |

11.2 External Contact Details

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| Public Concern at Work (Independent Whistleblowing Charity) T: +44 (0) 207 404 6609 E: whistle@pcaw.org.uk W: http://www.pcaw.org.uk/ A: 3rd Flr, Bank Chambers, 6 - 10 Borough, High Street, London, SE1 9QQ | National Crime Agency T: 0370 496 7622 E: communication@nca.x.gsi.gov.uk W: http://www.nationalcrimeagency.gov.uk A: 7 Old Queen Street, London, SW1H 9HP |
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Signed by: Steve Grant
Group Managing Director
Castor Vali Group



This policy is reviewed by CV Senior Management in accordance with the company’s Management Review Schedule.