

Whistleblowing policy and procedure

Our policy

Our firm has obligations under the Public Interest Disclosure Act (PIDA) to provide protection to staff who report concerns they may have about our firm's activities; reporting such concerns is commonly referred to as 'whistleblowing'.

It is our policy to train all staff about our Whistleblowing procedure and specifically to tell our staff:

- That we take failures seriously
- What conduct is regarded as a failure
- That their confidentiality will be respected if they raise concerns
- How they may report their concerns

We also have a procedure (see below) which is given to every member of staff and which they must sign to confirm they have read and will comply with. One copy of the signed document is place in the staff file and one is retained by the individual. This procedure:

- Sets out that concerned staff will be supported and protected from reprisals
- Nominates a senior member of staff as an alternative route to line management and tells our staff how they can contact that individual in confidence
- Makes it clear that false and malicious allegations will be penalised by our firm
- Tells our staff how they can whistle blow to sources outside our firm if necessary (e.g. to the Regulator)
- Provides access to an external body such as an independent charity for advice

This policy applies to all staff including permanent and temporary employees, officers, directors (executive and non-executive), consultants, contractors, agency workers, and anyone else undertaking work on behalf of, or with, the firm e.g. employees of third party suppliers, outsource providers and corporate partners.

Maintenance and communication of the whistleblowing policy and procedure is the responsibility of Ken Ebenezer and Amanda Long who are also responsible for ensuring that any report is investigated impartially and objectively, and for ensuring the firm acts to ensure timely resolution and, where of sufficient materiality, escalation of reports received to the firms Board.

This procedure forms part of our firm's conduct risk management systems and explains how staff should raise any concerns they may have regarding our firm's activities.

All staff are encouraged to raise genuine concerns about potential wrongdoing in any aspect of the conduct of our business.

Our firm is particularly concerned about any form of activity which could be reasonably considered to be:

- A criminal offence
- Fraud
- A failure to comply with any legal or regulatory obligations
- A miscarriage of justice
- Breaches of financial crime policy
- Bullying or harassment
- Unauthorised use of the firm's funds or assets
- The putting of the health and safety of any individual in danger
- Damage to the environment
- Deliberate concealment relating to any of the above

Nothing in your contract prevents you from disclosing concerns in relation to the Public Interest Disclosure Act 1998 and, that if you have any concerns, you may (if you wish) approach on a confidential basis:

Internal contact at Roomservice by CORT:

Name: Amanda Long
 Phone: 0208 879 5936 or 07910340843
 Email: Amanda.long@roomservicebycort.com

Group internal contact at Berkshire Hathaway:

Website: www.brk-hotline.com
 Phone: 0808 234 0033

External contact:

Protect (formerly Public Concern at Work)

The Green House, 244-254 Cambridge Heath Road, London, E2 9DA

Phone: 020 3117 2520 (option 1)
 Fax: 020 7403 8823
 Email: whistle@protect-advice.org.uk
 Website: www.pcaw.org.uk

The Financial Conduct Authority (FCA)

12 Endeavour Square, London E20 1JN

Whistleblowing contact line: 020 7066 9200
 Email: whistle@fca.org.uk
 Website: <http://www.fca.org.uk/site-info/contact/whistleblowing>

Post: Intelligence Department (ref PIDA)
 Financial Conduct Authority
 12 Endeavour Square, London E20 1JN

Any individual raising concerns will be supported and protected from reprimand.

Any concern raised directly with our firm will be dealt with openly, as this procedure aims to improve the workings of the firm and reduce any conduct risk that the firm may face.

The firm will make every effort to keep the identity of any staff member making a disclosure under this policy confidential. If it is necessary for a person investigating the concern to know the whistleblower's identity, this will be discussed with the whistle-blower in advance of the investigation

Any individual obstructing another individual's ability to report concerns could be subject to disciplinary action.

Any attempt to cover up wrongdoing may be subject to disciplinary action.

Reviewed and updated by Amanda Long January 2023