



Heartwood Wealth Management Limited is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is the provision of a mechanism to enable employees, contractors or suppliers to voice concerns in a responsible and effective manner.

Heartwood is committed to creating a secure working environment and expects its employees at all times to act within the law, applicable codes of practice, and to apply the highest possible operating/business ethics in all areas of its activities. Nevertheless, where an employee discovers information which they believe shows serious malpractice or wrongdoing within Heartwood then this information should be disclosed internally without fear of reprisal; Heartwood is committed to the provision of an effective mechanism to enable this to occur.

The Public Interest Disclosure Act 1998 (PIDA) provides guidance for dealing with whistleblowing issues in a safe and constructive way and this policy and procedure is designed to conform to such guidance. PIDA encourages you to raise any concerns internally in the first instance and it is hoped that you, as an employee of Heartwood, will feel able to raise any such concern internally, confident that it will be dealt with properly and that all reasonable steps will be taken to protect you from victimisation. If you don't feel able to raise or resolve a concern directly with your Line Manager, you should raise your concern directly with Heartwood's Compliance Team.

Policy

This policy provides protection to those employees who raise concerns, provided the disclosure is made in good faith and in relation to any event that is reasonably believed to be a qualifying disclosure. A qualifying disclosure is one which, in the reasonable belief of the worker, suggests that one or more of the following has been, is being, or is likely to be committed:

- a criminal offence
- the putting of the health and safety of any individual in danger
- a failure to comply with any legal obligation
- damage to the environment
- a miscarriage of justice
- deliberate concealment relating to any of the above
- a breach of regulatory rules
- a breach of Heartwood/the Bank's policies and procedures, or
- behaviour that harms or is likely to harm the reputation or financial well-being of Heartwood

Confidentiality

Heartwood will treat all such disclosures seriously and in a confidential and sensitive manner. The identity of the individual making the allegation will, if requested, and as far as reasonably possible, be kept confidential to only those employees involved in undertaking the investigation and to Heartwood's management or any external authorities who need to consider whether action should be taken, and the nature of such action on the basis of the findings. However it must be understood that there may be circumstances where the investigating officer may be

required to reveal the identity of the individual making the allegation, and even where such disclosure is not necessary, it is possible that the investigation process may reveal the source of the information; the individual making the disclosure may also be requested to provide a statement as part of the evidence required. Where it is necessary or desirable to disclose the identity of the individual then the agreement of the individual making the disclosure will be sought, unless prohibited by law, but where such disclosure is considered necessary, consent is not required. In any such event the protection afforded under PIDA will apply and Heartwood will take all reasonable steps to ensure that the employee suffers no disadvantage as a result of the disclosure and that no employee engages in any form of victimisation towards the employee who made the disclosure.

Timescales

Due to the varied nature of potential disclosures which may involve internal investigation and/or the police or other external bodies, it is not possible to lay down precise timescales for completion of such investigations. The investigating officer will ensure that the investigations are undertaken as quickly as reasonably possible without affecting the quality and depth of those investigations.

The investigating officer will, as soon as reasonably possible following receipt of a disclosure, send a written acknowledgement to confirm receipt. He or she will thereafter confirm the action that is proposed and, following completion of the investigation, will confirm the outcome. If the investigation is expected to be prolonged the investigating officer will provide periodic updates and confirm when the investigation is likely to be concluded.

Anonymous Allegations

Heartwood encourages individuals to put their name to any disclosures they make in the knowledge that they will be protected under the terms of this policy. Concerns expressed anonymously may be significantly more difficult to investigate, but will nonetheless be considered at the discretion of Compliance.

Unproven Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

Malicious or Vexatious Allegations

If an individual makes a malicious or vexatious allegation, disciplinary action will be taken against that individual.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by Heartwood, unless any such action is suspected to be criminal e.g. fraudulent or otherwise falls under the definition of a qualifying disclosure, nor should it be used to raise any matters which have already been addressed under harassment, grievance, disciplinary or other procedures. With appropriate internal "whistleblowing" procedures in place, Heartwood encourages employees to use them rather than to air their concerns directly outside Heartwood. Heartwood commits to investigating any matters raised thoroughly and properly.

If you have a malpractice concern, you should inform your Line Manager of the concern. Your Line Manager will then raise the matter with Compliance. If the concern involves your Line Manager or for any other reason you would prefer not to raise the matter with them directly, then you may raise the matter directly with Compliance:

If you want to send a letter please address it to:

Head of Compliance
Heartwood Wealth Management Ltd
No. 1 Kingsway
London
WC2B 6AN

If you feel you need to take advice before doing so, you may contact the independent charity, Public Concern at Work on 02074046609. They provide free, confidential legal advice on whistleblowing matters. But remember that there is no “gateway” to allow you to disclose any confidential information to them.

Investigation

A member of the Compliance Team will conduct or instigate a full investigation with the objective of establishing whether malpractice has occurred. The format of the investigation may vary depending upon the circumstances. Compliance will consider the involvement of the internal audit department and/or other individuals/bodies as appropriate in the light of the nature of the allegations.

Findings

The findings of the investigation will be communicated to you, as the person raising the concern, to the individual(s) under investigation, and to those members of Heartwood’s management or any external authorities who need to consider whether action should be taken and the nature of such action on the basis of the findings.

FCA

The FCA also provides a whistleblowing facility. Individuals with issues to raise are encouraged to raise them within their organisation first. However the FCA is a prescribed body to which individuals can, if necessary, make protected disclosures if they meet the requirements laid down in the Act.

If you are an employee and you’ve disclosed your concern internally and you are concerned either by the nature of the response or lack of response, or if you feel unable to talk to anyone internally for whatever reason, you can contact the FCA.

PIDA protects you if you contact the FCA where:

- you reasonably believe the information and any allegations in it are substantially true;
- you reasonably believe the FCA is responsible for the issue in question.

FCA’s direct whistleblowing number is 0207 066 9200

FCA’s direct email address is whistle@fca.org.uk

Further information is available at <http://www.fca.org.uk/site-info/contact/whistleblowing>

Letters may be sent to:

Intelligence Department (ref PIDA)
Financial Conduct Authority
25 The North Colonnade
Canary Wharf
London
E14 5HS

Whistleblowing Policy – updated September 2017