

## Whistleblowing Policy

### 1. **Policy**

- 1.1 Great Portland Estates plc and its subsidiaries (“GPE”) encourage a free and open culture in its dealings between its officers, its employees and people with whom it engages in business and legal relations. As an organisation, we are committed to stopping unethical practices in the workplace whenever they are found – a commitment that extends inside and outside of our organisation and is underpinned and supported by our Ethics policy and our Values. GPE recognises that effective and honest communication is essential if malpractice is to be dealt with effectively and GPE’s success is to be achieved.
- 1.2 This whistleblowing policy is designed to provide guidance to those who work with or within GPE who may from time to time feel that they need to raise certain issues relating to GPE with someone in confidence. GPE encourages individuals to raise concerns at the earliest possible stage and, if possible, internally in the first instance.
- 1.3 If you wish to raise concerns under this policy anonymously, your confidentiality will be respected (see section 4 below). Similarly, you should be able to raise genuine concerns without fear of reprisals, even if you turn out to be mistaken.
- 1.4 This policy covers all employees, officers, casual workers and agency workers. It also covers individual contractors and consultants, and employees of contractors and suppliers who provide services to GPE, whether they work at our developments or in our managed portfolio or elsewhere. This policy does not form part of any individual’s contract with GPE and GPE may amend it at any time.

### 2. **Matters for disclosure**

- 2.1 This policy should be used for the disclosure of information relating to suspected wrongdoing or dangers at work. This may include:
- . criminal activity, including (but not limited to) bribery, fraud, and facilitating tax evasion;
  - . failure to comply with any legal obligation or regulatory requirements, including (but not limited to) breach of data protection law, harassment, discrimination, and bullying;
  - . miscarriages of justice;
  - . danger to health and safety;
  - . damage to the environment;
  - . financial fraud or mismanagement;
  - . modern slavery or human trafficking within GPE or its supply chain;
  - . breach of our internal policies and procedures including our Ethics Policy, Financial Crime Policy and our Values;
  - . conduct likely to damage our reputation or financial wellbeing;

- . unauthorised disclosure of confidential information;
  - . negligence; and
  - . the deliberate concealment of any of the above matters.
- 2.2 If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities you should report it under this policy. If you are uncertain whether something is within the scope of this policy you should seek advice from the General Counsel & Company Secretary, whose contact details are at the end of this policy.
- 2.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use GPE's Grievance Policy, if this applies to you.

### 3. **Procedure for raising a concern**

- 3.1 If you wish to raise or discuss any issues which might fall into the categories listed above in section 2.1, you should feel you can raise any concerns with your Line Manager (for GPE employees) or your usual point of contact at GPE (for all service partners). You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the General Counsel & Company Secretary.
- 3.2 However, where the matter is more serious, or you feel that your Line Manager or usual contact (as applicable) has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:
- . the General Counsel & Company Secretary;
  - . GPE's Senior Independent Director; or
  - . Safecall, our confidential external telephone hotline.

Contact details are at the end of this policy.

- 3.3 If you have a personal interest in the matter you should inform GPE of this at the outset. If your concern falls more properly within the grievance or another procedure you will be informed and your concerns will be investigated under that process.

### 4. **Confidentiality**

- 4.1 Individuals should feel able to voice whistleblowing concerns openly under this policy. This is often the best way to ensure that a proper investigation can take place and establish whether allegations are credible. If you are reluctant for your identity to be revealed, please use our confidential whistleblowing hotline set out at the bottom of this policy and appropriate measures can then be taken to preserve confidentiality.

4.2 If you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

## 5. **Investigation and outcome**

5.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment, subject to any requirements regarding confidentiality.

5.2 In some cases we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

5.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary or other action taken as a result. You should treat any information about the investigation as confidential.

5.4 If you make false allegations maliciously, you may be subject to disciplinary action under GPE's Disciplinary Policy, if it applies to you. For those to whom this policy does not apply, other appropriate action may be taken.

## 6. **External disclosures**

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 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. It will very rarely, if ever, be appropriate to alert the media. If you are considering reporting a concern to any party other than GPE or Safecall, we strongly urge you to seek advice before doing so. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Protect can be contacted at 020 3117 2520 or [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk).

6.3 Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. 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, usual point of contact or one of the other individuals set out in section 3.2 for guidance.

## 7. **Protection and support**

7.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.

7.2 Appropriate steps will be taken to ensure that your working environment and/or working relationship is/are not prejudiced by the fact of your disclosure.

7.3 It is GPE's policy that whistleblowers will not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Any employee or service provider who is found to have subjected a 'whistleblower' to any detriment, including threats, bullying or other forms of retaliation or unfavourable treatment, will be subject to disciplinary or equivalent or appropriate action. Appropriate steps will be taken to ensure the working environment or relationship of those engaged by GPE is not prejudiced by the fact of a disclosure under this policy.

8. **Contact details**

**General Counsel & Company Secretary**

**Darren Lennark**

**0207 647 3093**

**[darren.lennark@gpe.co.uk](mailto:darren.lennark@gpe.co.uk)**

**Senior Independent Director**

**Karen Green**

**[Karen.Green@gpe.co.uk](mailto:Karen.Green@gpe.co.uk)**

**Safecall**

**Helpline: 0800 915 1571**

**[www.safecall.co.uk/report](http://www.safecall.co.uk/report)**