



WHISTLEBLOWING POLICY

It is important that any concerns which you may have about suspected malpractice within the Liberty International PLC Group are reported and accordingly the following policy has been adopted by the Liberty International PLC Board. The policy and procedure follows the guidance provided by the Public Interest Disclosure Act 1998 (PIDA). PIDA encourages you to raise any concerns internally in the first instance.

Policy

The policy applies to all permanent and short-term employees of the Liberty International PLC Group (“the Group”). It also applies to secondees, external consultants, contractors and agency personnel whilst employed by the Group (together known as “the employee(s)”).

The expression “malpractice” covers breaches of internal rules; criminal offences or breaches of civil law; endangerment of the health and safety of any person; environmental damage and also the deliberate concealment of any malpractice.

Any employee who makes what is called a “qualifying disclosure” is protected. To be a qualifying disclosure, an employee has to be making it in good faith and in the reasonable belief that one or more of the above types of malpractice has been committed or is being committed.

If you have cause to raise a malpractice concern, you will be treated fairly and justly and we will take all reasonable steps to prevent victimisation in any form. However, disciplinary action will be taken against anyone deliberately raising false or malicious allegations.

Procedure

1. Raising a concern: if you have a malpractice concern, you should inform in the first instance your immediate manager and Head of Department/Director.
2. If the concern involves your immediate manager or Head of Department/Director, or for any reason you would prefer not to raise your concerns with them, you may raise the matter directly with the Internal Auditor or Personnel Manager, or any member of the Audit Committee.
3. If preferred you can leave information anonymously on a special dedicated telephone line which has been established for this purpose and which is constantly monitored by the Internal Auditor and the Personnel Department. The telephone number is 0207 960 1214.

Further Information

Should you have any queries whatsoever regarding this policy and the stated procedures, please contact the Internal Auditor or the Personnel Manager.

THE LIBERTY INTERNATIONAL GROUP – WHISTLEBLOWING POLICY

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