

## Purpose

St. James's Place (SJP) is committed to a healthy workplace culture, based on **our three values**: doing the right thing, being the best version of ourselves and investing in long term relationships, to drive good outcomes for our clients. We want everyone to feel confident to raise any concerns they have about wrongdoing without fear of retaliation.



## Scope

The Speak Up Policy applies across the SJP Group, covering all legal entities, and includes whistleblowing, with anyone being able to raise a concern, including third parties and members of the public.

Everyone who works for and with SJP is responsible for the implementation of this Policy. We all have a responsibility to speak up if something is wrong which affects SJP, its clients, employees, the Partnership, shareholders or the public.

## Policy statement

Anyone can raise concerns about illegal or improper behaviour at SJP without fear of victimisation, discrimination or disadvantage.

SJP seeks to maintain high standards of business conduct and to always act ethically and with integrity. Everyone who works for and with SJP is responsible for raising concerns when they believe that something is wrong.



### The aims of this Policy are:

- ◆ To encourage individuals to raise concerns of suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated thoroughly and in confidence.
- ◆ To provide guidance on how to raise concerns.
- ◆ To provide reassurance that concerns can be raised without fear of retaliation.
- ◆ To explain what happens after a concern is raised.

## What is wrongdoing?

Whilst there is no definitive list of the types of concerns that should be raised, examples include:

- ◆ Criminal activity or breaches of regulatory or legal requirements by someone connected to SJP.
- ◆ Breaches of SJP's rules, policies, procedures, or client standards such as mis-selling.
- ◆ Conduct and behaviour that falls short of SJP's Code of Ethics, including bullying or sexual harassment.
- ◆ Behaviour that could harm the reputation or financial wellbeing of the SJP Group.
- ◆ Staff exploitation by one of SJP's suppliers or other indicators of modern slavery.
- ◆ Other risks or dangers at work such as health, safety and environmental concerns.
- ◆ A conflict of interests connected to SJP which is not being managed appropriately.
- ◆ The intention to commit, or the attempt to conceal, any of the above.

If you are unsure whether your concern falls under the Speak Up Policy, please contact a member of the Whistleblowing Team in confidence.

## How to raise a concern

We know that it can take courage to speak up and raise concerns. You can raise a concern by telephone, in person or in writing, and can do so in the following ways:



Method	Consequence
Anonymous	Your identity will not be available to anyone
Confidential	Your identity will only be known to the Whistleblowing Team
Named	Your identity will be known to all parties involved in any investigation

The channels for raising concerns are as follows:

- ◆ To your line manager or the Director in charge of the function you work in or with, if you are comfortable speaking to them about your concerns.
- ◆ To a member of the People Division (employees only).
- ◆ Directly to the Whistleblowing Team using the following contact details:
  - Email: [whistleblowing@sjp.co.uk](mailto:whistleblowing@sjp.co.uk)
  - Jordan Brewster, Head of Whistleblowing  
Email: [jorden.brewster@sjp.co.uk](mailto:jorden.brewster@sjp.co.uk)  
Telephone: 07760 913663
  - Helen Jenkins, Internal Audit Director  
Email: [helen.jenkins@sjp.co.uk](mailto:helen.jenkins@sjp.co.uk)  
Telephone: 07500 102091
  - John Hitchins, Whistleblowers' Champion  
Email: [john.hitchins@sjp.co.uk](mailto:john.hitchins@sjp.co.uk)  
Telephone: 07973 219517

If you prefer to raise a concern externally you are encouraged to use the independent telephone reporting line or secure web-based reporting service hosted by our independent third-party provider Navex. The 'Speak Up' hotline is confidential, free to callers and is operated 24 hours a day, 7 days a week. You may report any concerns on a named, confidential or anonymous basis. Your details and any information you provide will remain strictly confidential. Nothing will be captured that identifies you e.g. the Internet Protocol (IP) address of the computer/device used is not recorded. The secure web-based service can be accessed [here](#).

The freephone numbers for each country in which SJP operates are as follows:

- ◆ United Kingdom – 0808 196 5759
- ◆ Ireland – 1800 456724
- ◆ United Arab Emirates – 8000 120022
- ◆ Hong Kong – 800 902100
- ◆ Singapore – 8004 922820

After you raise your concern, you will be assigned a unique code called a 'report key' and asked to create a password. We ask you to use the 'report key' and password to return to Navex after 5 business days so you have the

opportunity to review any follow up questions, receive feedback or provide further information.

You can also raise your concerns externally with the Financial Conduct Authority (FCA), Prudential Regulation Authority (PRA) or other regulators in the UK, or with your local country regulator or competent authority. There is no requirement for you to raise your concerns internally before, during or after contacting the regulator.

If someone from SJP tries to deter you from speaking up, please contact the Whistleblowing Team and you can be assured that this will be dealt with appropriately.

## What happens after I raise a concern?



All concerns raised are treated in confidence. Your personal details or any other information that could reveal your identity will not be shared outside of the Whistleblowing Team without your permission, unless this is required for legal or regulatory purposes.

SJP takes concerns seriously and considers every concern raised. All concerns are managed by the Whistleblowing Team and investigated thoroughly. Where appropriate, we will work with an independent investigator to conduct an investigation. Throughout the investigation we put in place controls to protect the identity of those raising concerns.

If you raised a concern to your line manager, Director or a member of the People Division, they will consider whether the concern falls

within scope of the Speak Up Policy.

If it does, they will escalate the matter to the Whistleblowing Team. We may also report concerns to the FCA, PRA or other regulators in the UK, or to regulators in other jurisdictions.

Appropriate and proportionate action will be taken, depending on the investigation findings. Feedback will be provided to those raising concerns where possible during the investigation and at its conclusion, while considering the confidentiality of others.

If you are unhappy with the way in which your concerns have been handled, you can contact the Whistleblowers' Champion using the contact details shown on the previous page.

## What if I have a grievance?

Whistleblowing is different to a grievance. Both are equally important and need to be investigated. A grievance is usually a complaint about something that impacts an employee as an individual, such as terms and conditions of employment or how they are being treated. To raise a grievance, please speak to your line manager or the People Division.

If you have concerns in relation to the effectiveness of the grievance process, these concerns can be raised under the Speak Up Policy. Any investigation into such concerns would be focused on the overall process rather than any personal or individual matters.

## Protection and support

SJP does not tolerate any form of retaliation against anyone for raising a concern under the Speak Up Policy. This includes direct or indirect acts or omissions, which may be deemed retaliation. This protection extends to retaliation against anyone supporting a whistleblower, a witness or anyone involved in the investigation process. Retaliation will be deemed to be a disciplinary matter. If you believe you have suffered any form of retaliation as a result of raising a concern, please contact the Whistleblowing Team.

SJP's Whistleblowers' Champion is John Hitchins the Non-Executive Chair of the Audit Committee of the Board, who is responsible for ensuring that the policies and procedures on whistleblowing are independent and effective. This includes ensuring that those who raise concerns in good faith are protected from retaliation. The Whistleblowers' Champion is kept fully informed by the Whistleblowing Team of all whistleblowing concerns that have been raised and the outcomes of those concerns. If you have any concerns about the Whistleblowing Framework or the Speak Up Policy, please contact the Whistleblowers' Champion using the contact details shown above.

We provide annual training to employees, other workers, Partners, Advisers, and their support staff on the whistleblowing process and how to report a concern.

### Protected Disclosures

In the UK, the Public Interest Disclosure Act 1998 protects workers (including employees, temps, interns, work experience students and some contractors) from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on certain types of wrongdoing.

This legislation covers disclosures which, in the reasonable belief of the person making the disclosure, are made in the public interest.

It covers situations where one or more of the following has been committed or occurred, is being committed or is occurring or is likely to be committed or occur:

- ◆ A criminal offence,
- ◆ Non-compliance with any legal obligation to which an individual is subject,
- ◆ A miscarriage of justice,
- ◆ A health and safety breach,
- ◆ Damage to the environment, or
- ◆ The concealing of any of the above

SJP's Speak Up Policy facilitates reporting of a broader range of concerns than those which fall within the Public Interest Disclosure Act 1998, but only Protected Disclosures carry protection in law in the UK.

The PRA and FCA are prescribed persons under section 43F of the Employment Rights Act 1996, so, in the UK, they may be appropriate bodies to raise your concerns with if you do not feel it would be appropriate to raise the matter internally. Information about whistleblowing to these regulators is available on their websites at:

<https://www.bankofengland.co.uk/whistleblowing>

<https://www.fca.org.uk/firms/whistleblowing>

Local whistleblowing regulations and protections in other jurisdictions may differ from those in the UK. SJP seeks to comply with relevant local requirements in the territories in which SJP operates.

### Support for whistleblowers

For employees, additional support is available from the People Division or from the Employee Assistance Programme, details and contacts for these are available on the employee section of the intranet. There are also a number of charities which support whistleblowers, such as [Protect](#).