

Investec Ireland Whistleblowing Policy Summary

Compliance | December 2022



Introduction

Investec has a proud culture of promoting open and honest dialogue throughout the firm and its stakeholders and maintains a comprehensive whistleblowing policy. If you become aware of or suspect wrongdoing of any kind within the firm, we would encourage you to discuss this suspicion directly with us OR through an alternative reporting channel outlined below.

What is whistleblowing?

In broad terms, 'Whistleblowing' refers to the reporting of suspected misconduct, illegal acts or inappropriate behaviour within Investec Ireland (Investec) by any worker.

The definition of worker includes:

- employees (both past and present)
- board members (including non-executives)
- shareholders
- trainees
- job applicants
- volunteers
- ex-employees
- people engaging in work experience
- consultants
- agency workers

What is the Objective of our policy?

Our Policy lays down the protocol for employees and others to follow if they have concerns about a “**relevant wrongdoing**” connected with the firm, without fear of adverse repercussions to the employee.

The Policy aims to:

- Encourage workers to feel confident in raising concerns and to act upon such concerns rather than overlooking them;
- Provide specific points of contact for employees and others to raise concerns within the organisation.
- Provide that a person who makes a protected disclosure will receive feedback; and
- Reassure employees that they will be protected from unfair dismissal or penalisation (and to reassure others that they will not be subjected to detrimental treatment by Investec for making a protected disclosure.

What is a relevant wrongdoing?

Specific examples of a concern which might be raised could include:

- A criminal offence (e.g. fraud, money laundering, market abuse, corruption or theft) has been / is likely to be committed;
- The breach of a legal obligation;
- Dangers to health, safety and wellbeing;
- Improper conduct or unethical behaviour;
- Irregularities of a general, operational or financial nature in the company;
- Gross mismanagement, abuse of authority;
- Harassment or bullying;
- Any other form of serious improper action or conduct.

How are whistle-blowers protected?

Investec is committed to enabling individuals to voice concerns openly under their policy and is prohibited from penalising or threatening penalisation against a worker causing or permitting any other person to penalise or threaten penalisation against a worker, for having made a protected disclosure. The following protections should be noted:

- you are entitled to request confidentiality or choose not to reveal your identity;
- if you request confidentiality, your identity will not be disclosed at any time, unless (i) IEL is legally obliged to disclose your identity; (ii) disclosure is necessary to conduct the investigation; and (iii) the disclosure of such information is required if and when IEL decides to report such concerns to the relevant regulatory or criminal authorities;
- IEL will not tolerate any harassment, victimisation, detriment, threat or retaliation against you by reason of having raised a concern. We will treat such behaviour as a serious disciplinary offence, which will result in disciplinary action, up to and including dismissal;
- so far as reasonably practicable, any supporting evidence relating to the concern will be always kept secure.

How and to whom can I make a disclosure?

You can disclose reportable concerns in Investec by contacting the Head of Compliance or Head of People & Organisation on 01 421 0000

Should you not feel comfortable to raise your concerns with Investec and wish to raise your concern to an external party you may do so by contacting either of the below:

- Our Independent External Whistleblowing Hotline (Navex). This is a service run by a completely independent company called Navex who

provide a confidential reporting service. Navex may be contacted at 1-800-550-000

- Central Bank of Ireland

Where a worker wishes to make a report to the Central Bank relating to breaches of financial services legislation, they may make the disclosure through the following channels.

- **E-mail:** confidential@centralbank.ie
- **Phone:** 1800 130 014: Calls are answered Monday to Friday 9.30am - 5.00pm
- **Post:** Protected Disclosures Desk, Central Bank of Ireland, PO Box 559, Dublin 1.

Where can I seek more information on Whistleblowing?

If you have any queries in relation to Investec whistleblowing policy please contact the Head of Compliance on 01 421 0000.

Alternatively, you may find useful information at the below resources:

<https://www.centralbank.ie/regulation/protected-disclosures-whistleblowing>

https://www.citizensinformation.ie/en/employment/enforcement_and_redress/protection_for_whistleblowers.html