

# Whistleblowing

## Overview of current investigation process

The Whistleblowing team receive whistleblowing reports across a number of channels and organise an appropriate investigation into each allegation.

In the 12 months up to the end of April 2021, 51 Whistleblowing reports were made, however this number is expected to rise given the recent work to raise the profile of the Whistleblowing process. Of the 51 reports received:

- 23 reports that came directly to the Whistleblowing team;
- 11 reports that came through the Speak Up line;
- 16 reports that came through other channels including Grapevine (3), Customer Support (3) and other (10).

### Governance and process

The Whistleblowing team is currently made up of one Whistleblowing manager who reports into the Senior Financial Crime Officer who reports to the Head of Financial Crime.

The Whistleblowing Champion who is a POL non-executive director whose role is set out in the Whistleblowing policy.

Whistleblowing is governed by the Whistleblowing group policy and the Whistleblowing process document; these documents will be updated following changes to the team and implementation of a new case management system. The documents do not contain detailed guidance on the investigation process itself, but a pro-forma template has been developed and is now in use.

On receipt of a whistleblowing report, the Whistleblowing team triage the report to identify whether the case requires investigation and, if so, which manager within POL should be asked to undertake the investigation. External investigation can be commissioned if deemed to be required.

As the Whistleblowing team sits within Financial Crime, the case may be discussed with the Senior Financial Crime Officer or the Head of Financial Crime (who is also the MLRO) to decide on the appropriate action.

The case can also be escalated to the Whistleblowing NED if the case is deemed to be particularly complex or serious.

Where a case is deemed to be high risk, then the Head of Compliance is involved in deciding on the appropriate investigating team. Legal advice is also sought, if appropriate, although guidance on when this may be needed is not formally documented.

Investigators complete a standard template setting out how the investigation was undertaken and the outcome. The Whistleblowing manager reviews the relevant documentation and the outcome and will push back or escalate concerns about the investigation and/or the outcome if they feel it is not robust.

Investigations are reviewed for lessons learnt prior to the closure of the case. These are also included within the MI dashboard, which is shared with GE members and summaries provided at each RCC and ARC. The team work with the relevant teams across the business as matters arise to embed appropriate actions.

Whistleblowing MI is anonymised and reported monthly in full to the GE and the Whistleblowing Champion. This covers reporting channel, category of reports, affected areas, investigation outcomes, corrective actions and anonymised details of cases raised in the last month.

Summarised whistleblowing MI is provided to the Financial Crime team and is included in the Financial Crime & Supply Chain Monthly MI pack.

A Whistleblowing report is presented to the RCC and ARC twice a year.

Formal minuted meetings are held every quarter with the Whistleblowing Champion and ad-hoc meetings and correspondence in between if issues arise. Currently monthly meetings are also held with the Group General Counsel.