

Whistleblowing Procedure

The Board's assurance to you

The members of the Board of Persimmon Plc are committed to maintaining the highest standards of honesty, openness and accountability and recognise that you have an important role to play in achieving this goal. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

Employees will usually be the first to know when someone inside or connected with the Company is committing illegal or improper acts, but often feel apprehensive about voicing their concerns. This may be because they feel that speaking up would be disloyal to their colleagues or the Company itself. Or it may be because they do not think that their concerns will be taken seriously or they are afraid that they will be bullied or dismissed as a result. However, the Board does not believe that it is in anyone's interests for employees with knowledge of wrongdoing to remain silent. The Board aims to encourage openness and will support staff raising genuine concerns in good faith under this procedure, even if they turn out to be mistaken.

It is understandable that whistleblowers are sometimes worried about possible repercussions. The Board is clear that staff must not suffer any detriment, such as dismissal, disciplinary action, threats or other unfavourable treatment as a result of raising a concern in good faith. If you believe that you have suffered any such treatment, you should inform the Company immediately. If the matter is not remedied you should raise it formally using the Grievance Procedure. Staff must not threaten or retaliate against whistleblowers in any way and anyone involved in such conduct will be subject to disciplinary action.

The Board takes all malpractice very seriously, whether it is committed by senior managers, staff, suppliers or contractors. As such, the Board has established procedures by which you can report your concerns to us. These are outlined further below.

What should be reported?

It is impossible to give an exhaustive list of the unacceptable activities, but examples of matters which the Board would expect you to report include the following:

- Criminal offences;
- Failure to comply with legal obligations;
- Miscarriages of justice;
- Actions endangering the health or safety of employees, sub-contractors or the public;
- Actions which cause damage to the environment;
- Financial malpractice or fraud;
- Actions which are intended to conceal any of the above.

It will not always be clear that a particular action falls within one of these categories and you will need to use your own judgment. However, the Board would prefer you to report your concerns rather than keep them to yourself. This procedure 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 the Grievance Procedure or Anti-harassment and Bullying Procedure as appropriate.

Do I need to have proof? What if I am not certain?

It is not expected that you will have absolute proof of any misconduct, malpractice or suspicion that you report. However, you need to be able to show reasons for your concern.

Whistleblowers that make genuine reports are protected under The Public Interest Disclosure Act (1998). If you make a report in good faith then, even if it is not confirmed by an investigation, your

concern will be valued and appreciated and you will not be liable to disciplinary action. However, if you make a false report, maliciously or for personal gain, then you may face disciplinary action and any legal protection under the Act will be lost.

How can I report my concerns?

You can make a report either orally or in writing and it would normally be expected that this would be made internally to either to your line manager (or their manager); or a Director of your operating company. Which of these is the more appropriate will depend on the seriousness of the malpractice and who you think is involved. If, under the circumstances, you do not feel comfortable about making a report directly to these people, then you can report instead to either:

- The Group Internal Audit Manager; or
- The Group Company Secretary; or
- The Group Human Resources Director

All the above can be contacted at Persimmon plc, Persimmon House, Fulford, York, YO19 4FE. Tel: (01904) 642 199. Alternatively, if you feel unable to speak to any of the above directly you can call the confidential whistleblower line (0800 0147 060) to leave a message, or email whistleblowing@persimmonhomes.com.

How will the company deal with the report?

Any employee or Director who receives a whistleblowing allegation should ensure that Group Internal Audit are informed (either via the Group Internal Audit Manager or whistleblower@persimmonhomes.com). This ensures a consistent approach is followed and that matters are appropriately reported through the Risk Committee to the Board.

The Company will make preliminary enquiries to decide whether a full investigation is necessary. If such an investigation is instigated, then depending on the nature of the misconduct, concerns will be either:

- Investigated internally, usually by Group Internal Audit; or
- Referred to the appropriate external body or individual (for example our external auditors or the Police) for investigation.

If appropriate, a meeting will be arranged with you to discuss your concern further and to aid the conduct of the investigation. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Safeguards are in place to ensure that all reports can be fully investigated, even if the report relates to conduct of senior managers or Board members. Any such exceptional circumstances will be handled on a case by case basis, and discussed with an independent member of the Board as appropriate.

Subject to any legal constraints, you will be informed of the outcome of the preliminary enquiries, the full investigation and any further action that has been taken. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Can I remain anonymous?

If you wish to make a report anonymously, the Company will do everything possible to protect your anonymity. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) when you may be needed as a witness. If this be the case it will be discussed with you at the earliest opportunity. Please note, however, that the Board encourages staff to give their details as anonymous reports can prevent the obtaining of further information and may make the investigation more difficult. It is also more difficult to establish whether any allegations are credible and have been made in good faith.

Independent advice and external contacts

While the Board hopes that this procedure gives you the reassurance you need to raise matters internally, it recognises that there may be circumstances (for example, serious wrongdoing), where it may be appropriate for you to report your concerns to an outside body such as the Police. Protect (formerly Public Concern at Work) will be able to advise you on such an option and the circumstances in which you may be able to contact an outside body safely. If you are unsure whether to use this procedure or you want independent advice at any stage, you may contact the independent charity Protect, who can be contacted at: The Green House, 244-254 Cambridge Heath Road, London E2 9DA, Tel: 020 3117 2520, email:whistle@protect-advice.org.uk.

Additional concerns

The Company cannot guarantee that it will respond to your report in the way that you might wish. However it will endeavour to handle the matter fairly and properly, and by using this procedure, you will help it to achieve this.

If you are unhappy with the outcome of an investigation, you should submit another report explaining why this is the case. Your concern will be investigated again if there is good reason to do so. However, it may be that you do not think this appropriate and wish to raise your concerns with an external organisation, such as a regulator. It will rarely, if ever, be appropriate to alert the media. The Board strongly advises that before reporting concerns externally, you seek advice from Protect.

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