

Whistleblowing Policy

1. Introduction

The Chief Executive and Board of Persimmon are committed to running the Group in the best possible way, and to do this they recognise that they need your help. The Board understands that employees will usually be the first to know when someone inside or connected with the Group is committing illegal or improper acts, but might feel nervous about voicing their concerns.

This policy is in place to reassure you that it is safe and acceptable to speak up, and to enable you to raise any concern you may have at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter as soon as you have a concern. Through this policy, the Board aims to encourage openness, and to support staff raising genuine concerns, even if they ultimately turn out to be mistaken.

If something is troubling you, and you feel this is something that the Group should know about or look into, please use this policy. If, however, you wish to make a complaint about your employment, or how you have been treated, please use the grievance procedure, which you can obtain through the Access HR system or through the Group HR department. This policy is primarily for concerns where the public interest is at risk, which includes a risk to our people, customers, the public, or the Group itself. This could include concerns about fraud, theft, building safety, bribery or corruption, safe operations on site, or any legal, regulatory or ethical issues. **If in doubt, raise it!**

2. Aim

The aim of this policy is to:

- Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide staff with guidance as to how to raise those concerns.
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

3. Scope

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, interns and our suppliers and sub-contractors.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

4. What is Whistleblowing?

Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work. This may include:

- (a) Criminal activity
- (b) Failure to comply with any legal obligation or regulatory requirements
- (c) Building safety concerns
- (d) Danger to health and safety in operations
- (e) Damage to the environment
- (f) Bribery under our Anti-Bribery and Corruption Policy
- (g) Actions contrary to our Preventing and Detecting Tax Evasion Policy
- (h) Financial fraud or mismanagement
- (i) The deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern), you should report it under this policy.

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This policy 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 Policy as appropriate.

If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out above, or if you are uncertain whether something is within the scope of this policy, you should discuss with one of the contacts defined within section 6 below.

5. Our assurances to you

Your safety

The Chief Executive and Board of Persimmon are committed to this policy. Provided you are raising a genuine concern, it does not matter if you are mistaken. This assurance does not extend to anyone who maliciously raises a matter they know is untrue. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. The Board will not tolerate the harassment or victimisation of anyone raising a genuine concern, and will consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

Your confidence

With these assurances, we hope you will raise your concern openly. If you wish to make a report anonymously, you are free to do so and the Group will make every effort to protect your anonymity. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

However, you should be aware that if you do not tell us who you are (and therefore you are raising a concern anonymously), although we will make every effort to investigate, it may be much more difficult or impossible for us to look into the matter if we cannot obtain further information from you. We will also may not be able to protect your position or to give you feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously. If you are unsure about raising a concern you can get independent advice from Protect (see section 9 below).

6. How to report concerns

Option 1

Concerns can be reported in a variety of ways. In the first instance, you may wish to report (verbally or in writing) to either your line manager or a Director of your operating company. Which of these is the more appropriate will depend on the seriousness of the issue being raised, and the individuals you believe to be 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 through the Persimmon Plc office in York (01904) 642 199.

Option 2

Alternatively, if you feel unable to speak to any of the above directly you can report your concerns using the Group's whistleblowing provision. This can be accessed through web forms, which can be completed using the QR codes on the whistleblowing posters displayed in all offices and site cabins and are also shown here (see right). Concerns can also be reported by leaving a message via the confidential whistleblower line (0800 0147 060), or by emailing whistleblowing@persimmonhomes.com.



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7. How will the Company deal with the report?

Receipt and acknowledgment

Any line manager or Director who receives a whistleblowing report should ensure that Group Internal Audit are informed (through either informing the Group Internal Audit Manager or by emailing whistleblowing@persimmonhomes.com). This ensures a consistent approach is followed and that matters are appropriately reported through the Audit and Risk Committee to the Board. Records of reported concerns will be retained in a secure electronic folder accessible only to the Group Internal Audit department. Where possible, an acknowledgement of receipt of reported concerns will be provided within two working days.

Where appropriate, we will arrange a meeting with you as soon as possible to discuss your concern. 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. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Investigation process

The Group Internal Audit department will make an initial assessment to decide whether a full investigation is necessary, in conjunction with the Group HR Director and others as appropriate. We will inform you of the outcome of our assessment. If a full investigation is required, the 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).

If appropriate, you may be contacted 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.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

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.

Feedback

Wherever possible, and subject to any legal constraints, you will be informed of the outcome 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.

The Group cannot guarantee that it will respond to your report in the way that you might wish. However, it will handle the matter fairly and properly, and by using this policy, 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.

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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.

8. Protection and support

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness, and will support all those who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the contacts defined within section 6 immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

The Group will endeavour to support you throughout the whistleblowing process. If at any stage you believe you have experienced any reprisal, harassment or victimisation for raising a genuine concern, you should contact either the Group HR Director or the Group Internal Audit Manager at the Persimmon Plc office in York (01904) 642 199.

9. Independent advice and external contacts

While the Board hopes that this policy gives you the reassurance you need to raise matters internally, it recognises that there may be circumstances where it may be appropriate for you to report your concerns to an outside body. If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent charity Protect on 020 3117 2520 or by email at whistle@protect-advice.org.uk. Their Advisers can talk you through your options and help you raise a concern about malpractice at work.

10. Monitoring and oversight

The Board is responsible for this policy and will review it annually. The Group Internal Audit department will monitor the daily operation of the policy and if you have any comments or questions, please do not hesitate to let one of their team know.