

Speak Out (Whistleblowing) Policy

Document approved by	Skipton Building Society board
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Whistleblowing (or “Speaking Out”) is ‘making a disclosure in the public interest’ and occurs when a colleague (including contractor, consultant, temporary colleague), supplier or other third party raise a concern about danger, impropriety or illegality that affects others, for example colleagues, suppliers or members of the public.

The aims of this policy are to:

- (a) encourage you to feel confident in raising serious concerns and to question and act upon concerns about mal-practice
- (b) assure you that whilst you must have reasonable grounds for raising a concern, it is not necessary to have absolute proof of the alleged misconduct or malpractice
- (c) provide avenues to raise those concerns and receive feedback on any action taken
- (d) ensure that if you raise a concern you will receive an acknowledgement, updates on the investigation where appropriate and that you are aware of your options if you are not satisfied
- (e) reassure you that you will be protected from possible reprisals (detriment) or victimisation if you have a reasonable belief that you have made a disclosure in good faith

Board commitment

The Board of Directors of Skipton Building Society (the “Board”) is committed to maintaining the highest standards of honesty, openness and accountability and recognises that individual colleagues and other stakeholders have an important role to play in achieving this goal. In line with that commitment the Board expects colleagues, and other stakeholders, who have serious concerns about any aspect of the Society or the group’s* work to come forward and voice those concerns (Speak Out).

Colleagues and other third-party stakeholders are well placed to be the first to identify if someone inside or connected with the Society or a group business is potentially acting illegally or improperly. The Board encourages individuals with such knowledge, or reasonable suspicion, to voice those concerns through either the internal or external reporting channels.

The Board does not believe that it is in anyone’s interest for illegal or improper practices to go unchecked and requires the thorough and fair investigation of any report, taking appropriate action to address the issue.

The Board will not tolerate intimidation or failure to investigate any reasonable concerns.

Examples of misconduct or malpractice that the Board would expect to be reported are:

- Criminal offences
- Failure to comply with financial and legal obligations, or regulatory rules
- Behaviour that harms or is likely to harm the reputation or financial well-being of the Society and its group
- Wilful or negligent disregard for systems, controls, policies and procedures that may expose:
 - customers or clients to financial loss, unfair treatment or material distress and inconvenience
 - and/or the Society or its group to operational risk, financial loss, legal or regulatory sanction
- Disclosure of confidential information to unauthorised third parties
- Any matter prohibited under the Society’s Anti-Bribery and Corruption Policy that may involve the offering, giving, solicitation or the acceptance of a bribe
- Actions which endanger the health or safety of customers, clients, employees or the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above

Safeguards

Confidentiality

Appropriate action will be taken to protect the identity of anyone raising a concern in good faith. All concerns will be treated in confidence and mechanisms are in place to enable anonymous reporting where necessary.

Harassment or victimisation

Harassment or victimisation (including informal pressures) that occur because of a concern being raised will not be tolerated.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that may already affect a colleague or that may be under way in relation to them.

Speak Out Champion

The Society's Board has appointed the Chair of the Board Audit Committee as the Speak Out Champion. The Speak Out Champion is responsible for overseeing the implementation of an effective and accessible procedure to allow colleagues and other third parties to make a Speak Out (whistleblowing) report.

The Speak Out Champion also acts as a backstop in terms of receiving reports directly, where it would not be appropriate to raise a concern with a Speak Out Investigator. The Speak Out Champion will also be the final internal arbiter, if an individual isn't satisfied with the way their concern has been handled.

Speak Out Investigators

The Society maintains a list of named colleagues, independent of immediate line management, who are authorised to receive and investigate a Speak Out report. This list is set out in full within the Speak Out (Whistleblowing) Procedure document.

Reporting a concern

Concerns can be raised via Safecall 24/7 by calling Safecall UK on 0800 915 1571, or online at <https://www.safecall.co.uk/en/file-a-report/>

An individual can also choose to raise a concern with any of the Speak Out Investigators directly.

Alternatively a concern may be raised externally with the whistleblowing charity Protect.

Concerns can also be raised directly with the Financial Conduct Authority or Prudential Regulation Authority at any point in the process.

Annual Speak Out Report

An annual report for the Skipton group, including Skipton International Limited, Connells Limited, Skipton Business Finance Limited and Jade Software Corporation Limited, is presented to the Board on the whistleblowing arrangements and reports received in the year. This report is overseen by the Group Secretary and General Counsel and the Speak Out Champion.

Where a whistleblower refers their case to an employment tribunal, where all or part of their claim relates to detriment suffered as a result of raising a protected disclosure**, and the Society or a relevant group firm loses, a prompt report will be made by the Society or relevant group firm to the FCA for FCA regulated firms, explaining this.

* ("group" in this context means Skipton Building Society, Skipton Business Finance Limited, Amber Homeloans Limited, North Yorkshire Mortgages Limited. Note: Separate but similar policies are maintained by Skipton International Limited, Connells Limited and Jade Software Corporation Limited)

** A protected disclosure is a disclosure which is made by an individual who reasonably believes that the disclosure is being made in the public interest and that malpractice in the workplace is happening, has happened or will happen.