



ROBERT
WALTERS
GROUP

Whistleblowing Policy

December 2022

WHISTLEBLOWING

1. Our approach

1.1 The Robert Walters Group of companies (the "**Group**") seeks to conduct its business with honesty and integrity and believes that it has a duty to take appropriate measures to identify and remedy any malpractice within or affecting the organisation.

1.2 The aim of this policy is to offer a straightforward method for **third parties** to raise serious and genuine concerns about any wrongdoing connected to the Group. Third parties who may make use of this policy include the Group's clients, candidates, contractors, temporary and casual workers the Group engages for assignment at a client, suppliers, staff spouses or children, and dependents of staff or their spouse. If you are an employee or worker of the Group, you should not use this policy. Instead, you should use the Raising A Serious Concern At Work Policy. Any concerns, complaints or grievances that relate to a third party's own organisation's internal operations and practices should be dealt with through that organisation's normal reporting channels, policies or procedures. Such issues are not covered under this policy.

CLICK [HERE](#) FOR THE RAISING A SERIOUS CONCERN AT WORK POLICY

1.3 **NOTHING IN THIS POLICY IS INTENDED TO RESTRICT YOU FROM MAKING ANY DISCLOSURE TO AN APPROPRIATE REGULATORY OR LAW ENFORCEMENT AUTHORITY OR RELIEVES YOU OF ANY LEGAL DUTY TO DO SO.**

1.4 **THIS IS A GROUP-WIDE POLICY AND IS, AS FAR AS POSSIBLE, INTENDED TO BE APPLICABLE TO THE GROUP'S OPERATIONS ACROSS THE WORLD. HOWEVER, IT IS ACKNOWLEDGED THAT LOCAL LAWS REQUIRE ALTERNATIVE PROCEDURES AND PROCESSES. THESE VARIANCES ARE SET OUT IN A SUPPLEMENT AND WILL TAKE PRIORITY OVER THIS POLICY ("COUNTRY LEVEL VARIANCES").**

CLICK [HERE](#) FOR THE COUNTRY LEVEL VARIANCES.

1.5 "Whistleblowing" is using this policy to report any genuine suspicion you hold of actual or planned **wrongdoing or malpractice** that does not relate to you personally or which relates to you but may also negatively affect other people.

Some examples of types of suspected wrongdoing or malpractice at work that you may report under this policy:

- criminal activity by the Group
- failure to comply with regulatory requirements
- miscarriages of justice
- danger to the health and safety of the public or of any individual

- damage to the environment
- bribery
- facilitating tax evasion, financial fraud or mismanagement, including conduct which represents a danger to a national financial system
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters
- victimisation of a Whistleblower raising a Whistleblowing Concern
- adverse behaviour (including breaches of the Group’s policies)

1.6 This policy and process are not intended for complaints about the service you have received, employment-related matters or commercial disputes unless they fall into the definition of wrongdoing or malpractice set out above.

1.7 In this policy, the terms:

“Whistleblower” refers to the person raising the Whistleblowing Concern.

“Whistleblowing Concern” refers to the wrongdoing or malpractice of the Group which is being reported by the Whistleblower.

2. Raising a Whistleblowing Concern and process

2.1 Where it is appropriate, you are encouraged to engage with your day-to-day contact within the Group to address any concern you may have as an initial step. However, we acknowledge this may not be appropriate, for example where you are concerned that a crime is being committed and you are concerned that speaking with the Group would constitute “tipping off”.

2.2 If you have a Whistleblowing Concern, you should report it by email to reportconcerns@robertwalters.com. The email will be received by senior members of the Group’s Legal Team. Note, in some countries, Whistleblowing Concerns must be raised with specified persons or authorities in order for the Whistleblower to have the protections provided for under local laws. Please refer to our Country Level Variance page for more details.

2.3 Upon receipt of your Whistleblowing Concern, we will carry out an initial assessment to determine whether further investigation is necessary. If so, we will consider whether this should be conducted internally or referred to external experts.

2.4 Where possible, we will inform you of the outcome of any investigation. Depending upon the nature of the Whistleblowing Concern and the steps taken to address it, we may be limited in what we can tell you.

3. Confidentiality

It is possible to raise Whistleblowing Concerns anonymously. However, this may make proper investigations more difficult or impossible. It is also more difficult to establish whether allegations are credible and more difficult to identify or speak to witnesses. We, therefore, encourage you to identify yourself when raising a concern. However, we will always limit any disclosure of personal identities to a strict "need to know basis". If you choose to remain anonymous, we encourage you to maintain ongoing two-way communication with us, so we can ask follow-up questions or provide feedback.

4. External disclosures

4.1 The aim of the policy is to provide a mechanism for reporting, investigating, and remedying any wrongdoing. In most cases, third parties should not find it necessary to alert anybody else, except as specified in paragraph 2.1.

4.2 The law recognises that in some circumstances, it may be appropriate or permitted for you to report your concerns to an external body such as a regulator or an ombudsman. Please refer to our Country Level Variance page for more details

4.3 The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns. Their contact details are as follows:

Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 Contact Via Website: www.protect-advice.org.uk
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5. Raising a Concern Anonymously

5.1 The Group has appointed Safecall to operate an independent confidential reporting service.

5.2 Calls are handled by skilled staff and will be treated with complete confidence. A report of the call will be sent to the Chief Legal Officer (except where the Concern relates to the Chief Legal Officer, when the report will be sent to the Chair of the Audit and Risk Committee).

5.3 Safecall will not disclose your name if you wish to remain anonymous. Your call will not be audio-recorded. Calls received by Safecall will be treated confidentially and, should you wish, guarantee your anonymity.

- 5.4 You can contact Safecall 24 hours a days, seven days a week on a freephone number. Alternatively, Safecall can be contacted via the web.

CLICK [HERE](#) FOR A LIST OF FREEPHONE INTERNATIONAL NUMBERS, DEPENDING ON WHERE YOU ARE CALLING FROM

CLICK [HERE](#) TO ACCESS THE SAFECALL PORTAL

6. Protection for Whistleblowers

- 6.1 Any individual or organisation who raises a Whistleblowing Concern under this policy will not be treated less favourably or subject to any sort of detrimental treatment as a result. This is in addition to any local legal protections you may have.

7. Misuse of this policy

Deliberately raising false or malicious allegations is not acceptable and will be treated extremely seriously by the Group.