

## Whistleblowing Policy

Whistleblowing occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others.

This policy sets out the steps which must be followed when reporting potential, or actual issues, via whistleblowing, and Ascentis' responsibilities in dealing with such cases. Further information regarding the procedural steps Ascentis will follow when reviewing the cases can be found in our 'Malpractice and Maladministration Policy'.

A person making an allegation may wish to remain anonymous. However, it is preferable for individuals to reveal their identity and contact details to Ascentis, then to request Ascentis not to divulge their identity if concerned about possible adverse consequences. While Ascentis is prepared to investigate issues which are reported anonymously, we will always try to confirm an allegation by means of a separate investigation, before taking up the matter with those to whom the allegation relates. Requests for anonymity will be respected by Ascentis except where this is not possible for legal reasons.

Although Ascentis aim to keep the whistleblower's identity confidential, this cannot be guaranteed if their identity is required by another agency, for example:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with court proceedings)
- other third parties where we consider it necessary to do so (e.g. the regulator)

A whistleblower should also recognise that they may be identifiable to others due to the nature or circumstances of the disclosure.

Information by telephone must be followed by a written statement before it can be used in any investigation. Ascentis will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response according to our Malpractice and Maladministration Policy.

Ascentis aims to keep informants updated as to the progression of the allegation, but will not disclose details of ongoing investigations. In addition, it may not be appropriate to disclose full details of the outcomes of the investigation due to confidentiality or legal reasons (e.g. full details regarding the action taken against the parties concerned).

We aim to action and resolve all stages of an investigation within 28 working days of receipt of the allegation. Please note that in some cases the investigation may take longer; for example, if a centre visit is required. In such instances, we will advise all parties concerned of the likely revised timescale.

Ascentis will make a final report available to the parties concerned and to the regulatory authorities as appropriate. We will also inform the whistleblower normally within 5 working days of making our decision. In doing so we may withhold some details, if to disclose such information would breach a duty of confidentiality or any other legal duty.

For further information about the investigative procedure, please refer to our 'Malpractice and Maladministration Policy'.