

Raising Concerns (Whistleblowing) Policy

CAF Group

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1 Introduction

1.1 Policy Purpose

All CAF employees have a responsibility to protect CAF's reputation. The aim of this policy is to ensure that employees are confident they can raise any genuine matters of concern they may have confidentially and without fear of any repercussions or victimisation affecting their position within CAF.

A Whistle-blower is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within an organisation that is either private or public. This can include breaches of company policy/rules, laws, or regulation as well as fraud and corruption.

1.2 Who Does This Policy Apply to?

This Policy applies to all CAF entities and employees across the CAF organisation including but not limited to CAF, CAF Bank, CAF America, CAF Canada, CADF (Southampton Row Trust Limited) and CAF Financial Solutions Limited (CFSL)

The Policy applies to all CAF employees wherever located, whether temporary, fixed term, or permanent, consultants, contractors, trainees, seconded employees, volunteers, interns, agents, sponsors, or any other person or persons acting on CAF's behalf. The Standard also applies to CAF Trustees, and similarly applies to all attendees of CAF Boards (including non-executive directors) and related CAF Committee members at any level.

Where entities are based overseas, CAF acknowledges that their business activities and local requirements may, at times, necessitate a different approach to the implementation of the financial crime systems and controls. This could mean that overseas entities may have local requirements that are over-and-above, or different to this Policy. Where this is the case, CAF entities are required to either maintain separate documentation covering their approach and if appropriate agree a waiver or dispensation to address the specific parts requirements that cannot be adhered to and to provide rationale.

This Policy refers to 'CAF' to include all CAF entities and all CAF employees, unless otherwise specified.

CAF will provide accessible channels through which all colleagues can seek guidance on this standard and the implementation of the standard, raise concerns or report potential violations of the standard without fear of reprisal.

2 Policy Statement and aims

The Raising Concerns (Whistleblowing Policy) adheres to principles as set out by our primary regulatory bodies. The principles are based on:

- Guidance published by The Charity Commission; and
- Policy Statements published by the Financial Conduct Authority (FCA) and Prudential Regulatory Authority (PRA).

3 Policy Details

CAF's reputation is built on conducting business honestly, lawfully, and compliantly, wherever our employees are located across the world. However, as with all organisations, there is a risk that someone may decide to act differently. CAF's Executive will take appropriate measures to identify such situations and remedy them without fear of reprisal on the part of the Whistle-blower, thereby preventing such situations from reoccurring.

CAF will ensure that there is an open, transparent, and safe working environment and a culture where employees feel able to speak up. Where employees feel empowered to challenge actions, they believe put our customers, employees, or CAF's reputation at risk, they reinforce our commitment to our values.

3.1 Raising a concern

It is important that CAF creates the right environment to raise legitimate concerns and for these to be investigated fairly and thoroughly and rectified as required. This means that:

- employees are encouraged to raise genuine concerns;
- information on how to raise these concerns is easily accessible;
- a centralized process is in place to facilitate the reporting of inappropriate conduct confidentially and where permissible anonymously;
- employees are able to seek confidential support from an independent body to discuss concerns relating to inappropriate conduct;
- reports of inappropriate conduct are investigated thoroughly, confidentially and in a timely manner;
- CAF does not act against employees or treat them unfairly because they have reported inappropriate conduct; and
- CAF employees receive training on how to recognize and handle inappropriate conduct tailored to their responsibilities.

3.2 When to raise a concern

Whistleblowing provides the means for all CAF employees to report any concerns which may provide a threat to our customers, employees or CAFs reputation.

Whistleblowing is generally focused on raising concerns in the public interest. As such, personal grievances and complaints are not covered by this policy. These should be managed in accordance with other relevant CAF policies. Reasons for making a disclosure include:

- where a criminal offence such as internal fraud, bribery or theft has or is being committed, or is likely to be committed;
- questionable accounting practices or financial impropriety;
- a material breach of any law or regulation applicable to CAF or CAF Bank or CFSL which may relate to a material conflict of interest;
- where the health and safety of any individual has been, is being, or is likely to be endangered;
- the environment has been, is being, or is likely to be damaged;
- any of the above are being deliberately concealed or are likely to be deliberately concealed.

This is not an exhaustive list; however this aligns to what is expected from our regulatory bodies.

The list also summarizes a ‘qualifying disclosure’ that can be made under the Employment Rights Act 1996.

¹ a “qualifying disclosure” as defined in section 43B of the Employment Rights Act 1996 made by a worker in accordance with sections 43C to 43H of the Employment Rights Act 1996

3.3 Where to raise a concern

CAF places a high value on the integrity of its employees and operations and the importance to employees of being able to report any concerns they have in a confidential, non-prejudicial manner.

The following options are available to CAF employees should they wish to make a whistleblowing report.

Where to report your concerns	
All concerns	<ul style="list-style-type: none"> ▪ Line Manager or another manager ▪ Group People Officer ▪ CAF - Head of Risk and Compliance ▪ CAF Bank & CFSL - Chief Risk Officer ▪ CAF America & CAF Canada Vice President of Risk Management, Compliance, & Data Privacy ▪ HMRC (where relevant) ▪ Navex (external contracted hotline – see 9.2 below for details)
CAF concerns in addition to ‘all concerns’ can also approach	<ul style="list-style-type: none"> ▪ Charity Commission ▪ FCA (for AML matters only)
CAF Bank concerns in addition to ‘all concerns’ can also approach	<ul style="list-style-type: none"> ▪ PRA ▪ FCA
CFSL concerns in addition to ‘all concerns’ can also approach	<ul style="list-style-type: none"> ▪ FCA

NB: If a CAF employee is made aware of a whistleblowing case by a third-party source, this should be treated in strict confidence, and the NAVEX System Administrators (see section 8.5), notified immediately.

3.4 What is a reportable concern?

Reporting to the Charity Commission

You can report things that have happened, are happening or are likely to happen. Only report issues to the Charity Commission that could seriously harm the:

- people a charity helps;
- charity's staff or volunteers;
- services the charity provides;
- charity's assets; and / or
- charity's reputation.

Reporting to the FCA (for CAF Bank and CFSL) The FCA defines a reportable concern as:

- 'a concern held by any person in relation to the activities of a firm, including:
- anything that would be the subject-matter of a 'protected disclosure', including
- breaches of rules;
- a breach of the firm's policies and procedures; and
- behaviour that harms or is likely to harm the reputation or financial well-being of the firm.'

4 Policy Implementation

This policy will be implemented by the Group People Team with support from Risk and Compliance (R&C).

5 Controls, Monitoring and Review

5.1 Employee Awareness

CAF will ensure that all employees are aware of the existence of the Whistleblowing process.

This will be by ensuring that whistleblowing is incorporated into the mandatory training modules and induction which all employees undertake on joining CAF.

Ongoing employee awareness will be maintained through internal communications (such as Intranet) and through annual refresher training on Ethics and Fraud Awareness, and specific conduct training within CAF Bank and supporting departments.

Prominent notices will be displayed to ensure that employees are provided with reminders of the whistleblowing process via posters displayed in the office and intranet periodic updates.

The Group People Team are responsible for ensuring NAVEX System Administrators have received appropriate training and awareness in how to handle a report.

5.2 Confidentiality and Fair Treatment

CAF will treat all whistleblowing reports in a confidential and sensitive manner. The identity of the individual making the report will be kept in the strictest confidence unless required by law to be disclosed or shared.

CAF will not treat you unfairly at work because you blow the whistle. If the information you report, and how you report it meets specific requirements the law will protect you.

5.3 Reporting and Oversight

5.3.1 CAF

The CAF Audit Risk and Compliance Committee (ARCC) will receive an annual report on whistleblowing in respect of CAF and all its subsidiaries.

The Head of Risk and Compliance is responsible for preparation of the report with oversight being provided by the Whistle-blowers' Champions.

Group People Officer is responsible for providing required information to the Head of Risk and Compliance.

NB Information will be provided to enable the respective Business Entities to fulfil their reporting requirements.

5.3.2 CAF Bank and CFSL

The CAF Bank and CFSL Chief Risk Officer (CRO) will prepare the following for the CAF Bank Board and the CFSL Board:

- a report on Whistleblowing; and
- an annual report in respect of reports made about CAF Bank or CFSL. Both reports will include where there have been no whistleblowing reports received during the period.

The annual report will include a review of management actions to ensure the Whistleblowing policy and procedures are maintained in accordance with best practice and are understood by Bank or CFSL employees.

The CAF Bank and CFSL CRO is responsible for preparation of the report with oversight being provided by the Whistle-blowers' Champion.

5.3.3 CAF America and CAF Canada

CAF America & CAF Canada Vice President of Risk Management, Compliance, & Data Privacy will prepare the following for the CAF America and CAF Canada Boards respectively:

- a report on Whistleblowing; and
- an annual report in respect of reports made about CAF America and CAF Canada. Both reports will include where there have been no whistleblowing reports received during the period.

The annual report will include a review of management actions to ensure the Whistleblowing policy and procedures are maintained in accordance with best practice and are understood by employees.

The CAF America & CAF Canada Vice President of Risk Management, Compliance, & Data Privacy is responsible for preparation of the report with oversight being provided by the Whistle-blowers' Champion.

Note for all whistleblowing reports: Whilst it is not necessary to publish the report externally the Whistle-blowers' Champions should ensure that it is available to the relevant regulatory bodies on request. In addition to being in receipt of annual reports, the Whistle-blowers' Champions are also responsible for ensuring that if an employment tribunal finds in favour of a Whistle-blower who has been victimised then this is also reported to the relevant regulator.

The Group People Team are responsible for collating MI relating to whistleblowing and sharing it with the appropriate roles for reporting to Committees and Boards as required.

6 Record Keeping

The Group People Team will be responsible for all record keeping related to this Policy.

7 Non-Compliance & Exceptions

Any exceptions to this policy require the Waivers and Dispensation process as outlined in the CAF Group Policy Framework

8 Responsibilities

8.1 Whistle-blowers' Champions

The Whistle-blowers' Champions are responsible for assuring and overseeing the integrity, independence, and effectiveness of the organisation's policies on whistleblowing including those policies and procedures intended to protect whistle-blowers from being victimised. The Whistle-blowers' Champions need not have a day-to-day role handling disclosures from whistle-blowers.

8.2 CAF (applies to all employees working in CAF. For CAF Bank and CFSL see 8.3, For CAF America and CAF Canada see 8.4)

The CAF Trustees have overall responsibility for Whistleblowing. They delegate their responsibility to the Chairman of the CAF Audit Risk and Compliance Committee (ARCC) who is the designated Whistle-blowers' Champion for CAF.

The CAF Head of Risk and Compliance (or if the position is vacant the interim officer as approved by the CAF Chief Executive) is responsible for day-to-day handling of whistleblowing reports in CAF. The CAF Chief Executive has responsibility for ensuring that cases are investigated in accordance with the approved escalation and hierarchy processes unless the whistleblowing refers to the CAF Chief Executive in which case it should be escalated to the CAF Chair of Trustees.

8.3 CAF Bank and CFSL (applies to all employees working in CAF Bank and CFSL)

The Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA) expect that for CAF Bank the Whistle-blowers' Champion role is performed by a non- executive director who holds an SMF for CAF Bank.

The Financial Conduct Authority (FCA) expect that for CFSL the Whistle-blowers' Champion role is performed by a non- executive director who holds an SMF for CFSL.

The Whistle-blowers' Champion's allocated responsibilities are set out in SYSC 18.4.4R. In summary, responsibility for the independence, autonomy and effectiveness of the firm's policies and procedures on whistleblowing, including the procedures for protection of employees who raise concerns from detrimental treatment.

The CAF Bank and CFSL Chief Risk Officer (CRO) is responsible for day-to-day handling of whistleblowing reports within CAF Bank and CFSL.

The Chief Executive of CAF Bank and CFSL (CEO) has responsibility for ensuring that cases are investigated in accordance with the approved escalation and hierarchy processes, unless the whistleblowing refers to the CEO, in which case it will be escalated directly to the Chair of the CAF Bank Board Risk and Compliance Committee (BRCC) or to the CFSL Board as appropriate. A notification will also be sent to the CAF Chief Executive Officer on a timely basis.

8.4 CAF America and CAF Canada

The CAF America and CAF Canada Vice President of Risk Management, Compliance, & Data Privacy is responsible for assuring and overseeing the integrity, independence, and effectiveness of the organisation's policies on whistleblowing including those policies and procedures intended to protect whistle-blowers from being victimised. The Whistle-blowers' Champions need not have a day-to-day role handling disclosures from whistle-blowers.

8.5 System Administrators/Case Handlers

System Administrators are responsible for the initial receipt and allocation to a case handler of a whistleblowing case received via the NAVEX system as per business procedure.

As a System Administrator or a Case Handler, you must ensure you have received the appropriate guidance and training to handle a whistleblowing report should you receive one.

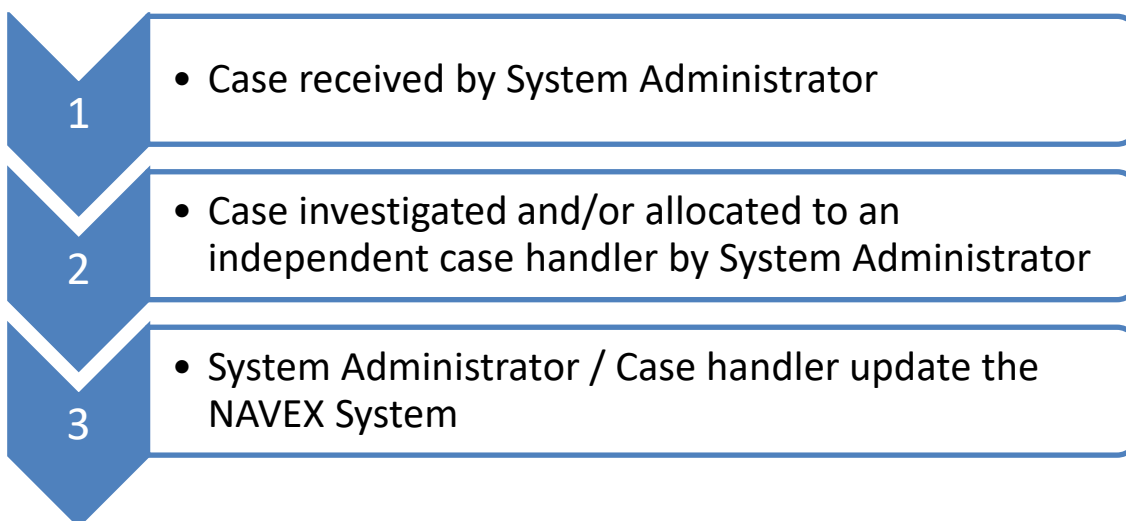
All reports received should be treated in the strictest of confidence.

The System Administrators of cases submitted via NAVEX online or telephony system are the CAF Head of Risk and Compliance and the CAF Head of People and Purpose (or their appropriate delegate). The System Administrator will review the case, they may investigate the case themselves, or allocate to a specific case handler to support. This case handler will always be independent from anyone mentioned in a specific case and could even be from a different

business unit from where the claim has been observed. This is to ensure independence, impartiality, confidentiality and build trust.

If for any reason a System Administrator is mentioned in a case, they will not even be aware that a case has been submitted, further ensuring impartiality and independence.

Workflow where a case is submitted via NAVEX:



The Group People Team (or System Administrators) provide high level information to enable each business unit to report on whistleblowing to their respective boards.

9 How to report a concern externally

All CAF employees may choose to make their report through any of the available methods and these can be done at any time – it is not necessary to first use CAF's internal arrangements so an employee could provide, for example, simultaneous reports to CAF and to the FCA and/or the Charity Commission or just report directly to one of the external regulatory authorities.

The diverse nature of disclosures might result in some investigations taking more time than others. Where the issue has been raised via Navex they will be made aware of the outcome of the investigation so that the employee raising the report can be updated on the outcome although confidentiality considerations may prevent some details being fed back.

9.1 Reports made to the FCA or PRA

The PRA and FCA are 'prescribed bodies' under the Protected Interest Disclosure Act 1998 (PIDA). The PIDA is an Act to protect individuals who make certain disclosures of information in the public interest; to allow such individuals to bring action in respect of victimisation; and for connected purposes.

Further information on Protected Disclosures and the PIDA is available from Navex or via the following link: <http://www.legislation.gov.uk/ukpga/1998/23/section/1>

9.2 Navex

CAF Group has established a 24 hour / 7 day a week hotline that is operated under contract by Navex. To support with this policy, CAF works with Navex, a global organisation that helps manage people and regulatory risk.

Navex have clear reporting guidelines and an agreed escalation process that follows this policy. They liaise with the aforementioned System Administrators.

Should you have a genuine concern, CAF encourages you to speak to either your line manager a member of the leadership community or a member of the HR Operations team.

If you feel that this is not possible, you can report in confidence to Navex through their EthicsPoint Incident Management system: caf.ethicspoint.com

If you prefer to call, phone 0800 890011 (note UK number only) and you will be prompted to dial a second number at which point you will need to dial 833 678 1252.

To raise any concerns for CAF America or CAF Canada, you can also contact the hotline:

US - 833-678-1252/Canada - 833-678-1252 or at EthicsPoint - Charities Aid Foundation (7 days a week, 24 hours a day) caf.ethicspoint.com

10 Related Policies & Standards

- Treating Customers and each other Fairly Policy (CAF Bank and CFSL)
- Ethics and Conduct Policy – Group
- Gifts & Hospitality Standard – Group
- Unfair Commercial Practices – Group
- Conflicts of Interest Policy – Group

11 External references

None

12 Policy Governance

Policy Owner	Group People Officer / Head of People and Purpose
Review frequency	Annually or where there is a business or regulatory need
Next Review date	May 2024
Stakeholders/Reviewers	As per the CAF Policy Framework
Document Approval	Minor Changes Policy Owner Major Changes CAF Executive Committee

13 Policy Version Control

Version control table

Version	Date Changed	Change Author	Summary changes
1	January 2016	Fiona Boyer	New Policy issued
2	September 2016	Sally Houchen	Revised to include addition of Whistleblowing Champion
3	August 2017	Sarah Rowe	Annual review – minor revisions
4	September 2018	Sarah Rowe	Annual review – minor revisions
5	May 2020	Fiona Boyer	Annual review – revisions made to Bank Authorized Recipient Hierarchy, inclusion of FCA definition of reportable concern
5.9	February 2021	Fiona Boyer	Annual review – minor revisions to include People Team responsibilities and what to report to the Regulator.
7.0	July 2022	Keely Fletcher/Tom Pandya	Annual Review and Full update/new policy template and guidance
8.0	September 2022	Roy Bartholomew	Minor revisions for accuracy of CAF Bank Committee refs
8.1	October 2022	Roy Bartholomew	Minor revisions for inclusion of Navex link and escalation process
8.2 Draft	April 2023	Vanessa Sands	Minor revisions to content Moved to New Policy Template, which changed the order, not the content Reviewed Authorised recipients section and recommend removal of Appendices Sent to Director of People and Purpose for review
8.3 DRAFT	May 2023	Vanessa Sands	Minor revisions following feedback from document owner
8.4 DRAFT	May 2023	Vanessa Sands	Version to be presented at CAF Executive Committee
8.5 Final	May 2023	Vanessa Sands	Minor revisions following feedback at Executive Committee (Approval given subject to these)

Version	Date Approved for Issue	Who Approved
8.5 Final	Exec committee 24/05/2023	CAF Group Executive Committee