



# WHISTLEBLOWING POLICY

## WHAT IS THIS?

Our company policy which protects individuals from retaliation or repercussion if they bring to attention any negligence or wrongdoing within the company.

Whistleblowing policies also relate to the UN Sustainable Development Goal (SDG) 16: Peace, justice, and strong institutions.

## WORRIED ABOUT POSSIBLE MALPRACTICE?

If you are concerned about possible wrongdoing, the Public Interest Disclosure Act 1998 (PIDA) provides guidance for dealing with these and other whistleblowing issues in a safe and constructive way. It encourages you to raise concerns **internally** in the first instance.

## WHAT IS A REPORTABLE CONCERN?

This is any concern you have with regards to the activities of our firm. For example:

- Anything that would be the subject matter of the protected disclosure, or
- A breach of our firm's policies and / or procedures, or
- The behaviour that would (or could) harm the reputation or financial position of our firm

## CONTACT FOR WHISTLEBLOWING

We hope that you will feel able to raise any such concern confident that it will be dealt with properly and that all reasonable steps will be taken to protect you from victimisation. Please contact Mark Hall, Compliance officer for BIMG.

Email: [Mark.Hall@beckettinvest.com](mailto:Mark.Hall@beckettinvest.com)

Postal Mail: Dettingen House, Dettingen Way, Bury St Edmunds, Suffolk, IP33 3TU. Attn: Mark Hall

Phone (for urgent concerns): 01284 754500

## YOUR PROTECTIONS

PIDA states that individuals who make qualifying disclosures of information in the public interest have the right not to suffer detriment by any act or omission of their employer because of the disclosure.

A qualifying disclosure is one which, in the reasonable belief of the stakeholder, suggests that one or more of the following has been, is being, or is likely to be committed:

- A criminal offence
- A failure to comply with any legal obligation
- A miscarriage of justice
- The putting of the health and safety of any individual in danger
- Damage to the environment
- Deliberate concealment relating to any of the above

PIDA protects you in making a disclosure where the disclosure meets the requirements set out above and is made in good faith. Protections under the Whistleblowing Policy does not extend to those who act in bad faith or raise malicious, vexatious, or knowingly untrue concerns.

Attempts to uncover a whistleblower's identity can be hugely damaging and may require disciplinary action. Retaliation can have a significant negative impact on a whistleblower's career, mental health, and overall well-being.

Someone who is not protected by law can still make a disclosure to us.

## ADVICE

If you want free, confidential advice on what is protected by PIDA and how best to raise your concern, you can contact Public Concern at Work on 020 7404 6609 or [www.pcaw.co.uk](http://www.pcaw.co.uk) (England & Wales) or on 0141 550 7272 or [www.scotland@pcaw.co.uk](mailto:www.scotland@pcaw.co.uk) (Scotland).

## EXTERNAL - FINANCIAL CONDUCT AUTHORITY

Tel: 0207 0669200

E-mail: [whistle@fca.org.uk](mailto:whistle@fca.org.uk)

Web-site: <http://www.fca.org.uk/site-info/contact/whistleblowing>

## IN WRITING:

Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, Stratford, London, E20 1 JN

If you're worried about something at work, it may be that you are concerned about something that is relevant to the functions of the FCA. If you are concerned you can contact the FCA.

PIDA protects you if you contact the FCA where:

- You satisfy the test for speaking to your employer (see above);
- You reasonably believe the information and any allegations in it are substantially true; and
- You reasonably believe the FCA is responsible for the issue in question.

You are entitled by law to approach the FCA, if you choose to do so at any stage and whether or not you have raised the concern internally in the first instance. Please note that there are other bodies prescribed under PIDA for a range of matters apart from financial services

Beckett Investment Management Group endorses the Public Interest Disclosure Act as part of its risk assessment procedure.