

R&M POLICY · PEOPLE AND ETHICS

Whistleblowing Policy

R&M Property Group Ltd

Document	RM-PE-05
Version	1.0
Approved by	Thom McKenna, Director
Website issue	22 October 2026

1. Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that R&M Property Group Ltd is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

2. Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that you genuinely and reasonably believes is in the public interest and shows that R&M Property Group Ltd has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. R&M Property Group Ltd will take any concerns that you may raise relating to the above matters very seriously.

- The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under R&M Property Group Ltd’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, ie it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

3. The procedure

In the first instance you should report any concerns you may have to your line manager, where the concern relates to your line manager or it is not appropriate to make the report to your line manager. All concerns reported will be treated in the utmost confidence.

R&M Property Group Ltd has a form for you to report your concerns otherwise; you may submit your concerns in any format. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

If you do not report your concerns to *Andrew Wimpenny* you should take them direct to the appropriate organisation or regulatory body with authority for that area.

Following receipt of a disclosure made under this policy, an investigation meeting will be held. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigation manager will write to you confirming the outcome.

If you are not satisfied with the explanation or outcome, you may raise the matter with the *most senior position in* organisation or the appropriate official organisation or regulatory body.

4. Formal action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

5. Protection against detrimental treatment

Everyone who raises matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.