



Whistleblowing Policy Statement

Aim and scope of this policy

This policy aims to provide a procedure for individuals to raise concerns of 'whistleblowing'.

This Whistleblowing Policy is intended to cover concerns that fall outside the scope of Employee Whistleblowing which is covered by a separate policy and procedure.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements;
- falsifying information
- bribery and anti-bribery

Safeguards

General

The Company will treat any concern raised under this procedure in the strictest confidence. Depending on the nature of a concern an individual is free to disclose that concern to an appropriate third party regulatory body, such as the Health & Safety Executive or HM Revenue & Customs.

Anonymous allegations

The Company will do its best to protect the identity of a person who does raise a concern. It must be appreciated that the investigation process may reveal the source of the information and a statement by an individual may be required as part of the evidence.

This Whistleblowing Policy encourages individuals to put their name to an allegation. Concerns expressed anonymously are evidently much less powerful, but they will be considered at the discretion of the Company.

Untrue and malicious allegations

Just as we will seek to protect those who raise concerns which they reasonably believe are in the public interest and show wrongdoing, even if it later transpires that there is no basis for concluding that any malpractice has occurred or may occur, we will also protect those against whom claims are made, where the person raising the claim does so maliciously, knowing it to be untrue.

How to raise a concern

Please submit any issues you wish to raise in the first instance to the following email address: Whistleblowing@village-hotels.com.

Concerns should be raised in writing. The background and history of the concern should be set out, giving names, dates, places and witnesses etc where possible, and the reason why there are particular concerns about the situation.

How the Company will respond

The action taken by the Company will depend on the nature of the concern. The matters raised may:

- be investigated internally;
- be referred to the Police; or
- form the subject of an independent inquiry.

In order to protect individuals and the Company, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.