



# *Rabobank UK Branch Whistleblowing Policy (External only)*

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# 1. Applicability

This policy applies to external individuals (including prospective employees and previous employees) who wish to raise a concern in relation to Rabobank UK Branch. The location of the individual does not matter. For the avoidance of doubt, any current employees or other workers at RBUK should refer to the appropriate internal policies for raising of concerns.

## 2. Whistleblowing

### 2.1 Reportable Concerns

If you believe or have a reasonable suspicion that one or more of the breaches/issues set out in 2.1.1 below has been, is being or is likely to be committed you may make a disclosure through the appropriate channels as provided for in this policy.

#### 2.1.1 Examples of breaches/issues:

A concern/suspicion held in relation to Rabobank including (but not limited to):

- a breach or imminent breach of internal policies/procedures, such as the Rabobank UK Principles and Standards;
- breaches relating to financial crime or market abuse rules;
- behaviour that harms or is likely to harm the reputation or financial well-being of the Bank or any regulated firm;
- breaches of the UK Modern Slavery Act 2015
- any matter that if disclosed would be the subject-matter of a 'protected disclosure', being any disclosure of information which, in the reasonable belief of the worker making the disclosure, is made in the public interest and tends to show one or more of the following—
  - a) that a criminal offence has been committed, is being committed or is likely to be committed,
  - b) that a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject (e.g. MiFID), including a breach of any PRA or FCA rules,
  - c) that a miscarriage of justice has occurred, is occurring or is likely to occur,
  - d) that the health or safety of any individual has been, is being or is likely to be endangered,
  - e) that the environment has been, is being or is likely to be damaged, or
  - f) that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

### 2.2 The Whistleblowing Process

#### 2.2.1 Reporting Your Concern

A number of channels are available to individuals wishing to raise concerns or seek advice on next steps. Please see below for details on the channels which include a variety of mechanisms (phone, online etc.) across both internal and external contacts, and some of which facilitate anonymity. Anyone wishing to raise a concern should choose whichever of the mechanisms they feel most comfortable with (please note the distinction between confidentiality and anonymity set out below in section 2.3).

**It should be noted that UK rules allow reporting to the regulator simultaneously. It is not a requirement to exhaust internal channels before reporting concerns to a regulator.**

#### 2.2.2 Investigation & Resolution

Following your disclosure, an assessment will be made of the appropriate procedure to be followed in the circumstances and you will be notified accordingly. Any investigation will be carried out as quickly as is possible (see the end of this document for information on updates you can expect to receive). Please note that our internal processes mean the reportable concern may be dealt with/viewed by the appropriate individuals/teams in the Netherlands though your individual contact point is likely to sit within the UK.

## 2.3 Protection for Whistleblowers

### 2.3.1 Confidentiality

Rabobank will make every effort to keep your identity confidential. This may include using code names in any written or verbal communication, discussions, investigations etc., and storing documents which refer to you confidentially and securely with access limited only to those who need to know. In normal circumstances Rabobank will only disclose your identity if it is necessary to do so and will discuss this with you in advance.

### 2.3.2 Anonymity

You may also raise your concern with full anonymity meaning that your identity is not known to anyone at all, including the recipient of your report. Several of the channels below facilitate this, however it should be noted that this makes disclosures more difficult to investigate, though every effort will be made to investigate as far as possible to do so. Any individual holding information relating to the reported concern must keep the information confidential unless required by law or Bank policy to disclose it.

### 2.3.3 Victimization and Retaliation

Victimization refers to causing detriment or disadvantage to an individual thought or known to be involved in the issue of concern raised. Victimization might occur through actions such as bullying, intimidation, or rejection for additional work. Retaliation refers to an act by another individual in response to the raising of a reportable concern which results in another individual involved in the case feeling they have been subjected to less favourable treatment or otherwise been disadvantaged. Victimization and Retaliation can originate from anyone with knowledge of the case.

Rabobank takes seriously acts (including attempted acts) of Victimization and Retaliation towards the whistleblower, accused person(s) or other parties involved in a concern. In the event individuals involved in a case believe they are experiencing an act of Retaliation or Victimization, they may report this via the channels below. Rabobank will take action to the extent possible against external parties (such as business partners) involved in Retaliation or Victimization. The aforementioned protection also applies if the reported concern is not substantiated following investigation.

## 2.4 Will I receive updates once I have raised my concern(s)?

- If you raise your concern directly to Rabobank, we will provide you with confirmation of receipt of your report within seven calendar days. We will provide you with updates on the general progress of your case within three months of initial contact.
- If you raise your concern anonymously through the external Hot line or web application set out below, KPMG will be able to provide you with an update as you will be given a Case Number which allows you to access your report.
- If you obtain advice from *Protect* they too will provide you with updates.
- For any other external channels used, you will need to discuss with them directly how the follow up process will work.

## 3. How and to Whom can I Report Concerns ?

You may report your concerns through any of the internal and/or external channels below.

### 3.1.1 Head of UK Branch (Rabobank UK)

You may report your concern(s) to the Head of Rabobank's UK Branch. Information on the Head of the UK Branch is available in the [FCA register](#). Contact details for raising concerns are as follows - please note you must state if you wish to remain anonymous otherwise your case will simply be dealt with as confidential but not anonymous.

**Name:** Mr Will Jennings  
**Position:** Head of UK Branch  
**Work email:** [will.jennings@rabobank.com](mailto:will.jennings@rabobank.com)  
**Work Tel:** +44 (20) 78093433  
**Work Mob:** +44 7824 409198

### 3.1.2 KPMG trusted representative, hotline or web portal

Rabobank has appointed an external trusted person from KPMG. The three KPMG channels are set out below inclusive of the contact details

- i) **KPMG UK representative** – you can contact the KPMG UK representative (Matt Congreve) directly by phone or email (but must explicitly state if you want to remain anonymous).

[Matt.congreve@KPMG.co.uk](mailto:Matt.congreve@KPMG.co.uk)  
Mobile: 07775755442

- ii) **KPMG hotline** - you can also contact KPMG via the Hotline and leave a message on the recorded line. Please use the dedicated Freephone number and Location ID Code. The Free phone Hot Line will allow you to leave a recorded message and it will also provide you with a Case Number. You must keep the Case Number so that you can access any feedback to your submission.

0800-1693502  
Access code 16741

- iii) **KPMG web portal** - If you do not want to speak to a person but instead submit a written concern, then you can access KPMG via the web based portal. Once you have made your submission, you will be assigned a Case Number. This Case Number will allow you to find out what progress has been made.

[www.speakupfeedback.eu/web/th6pep/gb](http://www.speakupfeedback.eu/web/th6pep/gb)  
Access code 16741

### 3.1.3 To UK Regulators

You may disclose concerns directly to the PRA, FCA or SFO. You **do not** have to make an internal report to Rabobank first. You can also report to the regulator(s) alongside reporting internally, if you wish.

**a. Financial Conduct Authority (FCA) Whistleblowing Details**

FCA's direct whistleblowing number: 020 7066 9200

FCA's direct email address: [whistle@fca.org.uk](mailto:whistle@fca.org.uk)

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

Further information on FCA website: <https://www.fca.org.uk/firms/whistleblowing>

**b. Prudential Regulatory Authority (PRA) Whistleblowing Details**

PRA's direct whistleblowing number: 0203 461 8703

PRA's direct email address: [whistleblowing@bankofengland.co.uk](mailto:whistleblowing@bankofengland.co.uk)

Address: *IAWB team, Legal Directorate, Bank of England, Threadneedle Street, London, EC2R 8AH.*

Further information on PRA website: <https://www.bankofengland.co.uk/prudential-regulation/whistleblowing-and-the-pra>

**c. Serious Fraud Office (SFO): www.sfo.gov.uk**

Contact should be made through the link below. No phone calls are permitted.

<https://www.sfo.gov.uk/publications/information-victims-witnesses-whistleblowers/>

### 3.1.4 To Prescribed Persons

You may also contact prescribed persons (which includes the FCA and PRA). A list of prescribed persons is available on HM Government website using the link below

*HM Government, List of Prescribed People and Bodies ([www.gov.uk/government/publications](http://www.gov.uk/government/publications))*

## 3.2 Who can I talk to externally for free impartial advice?

**Protect** is a Whistleblowing charity which, amongst other activities, provides a free confidential advice line. Rabobank UK Branch makes an annual contribution to this charity so that staff can have access to Protect for legal advice and support in the event that they are considering making a disclosure under the Whistleblowing policy. The Protect Advice Line is managed by qualified lawyers whose services are designated by the Solicitors Regulation Authority and as such have a duty of confidentiality to those that call the Advice Line. Therefore they cannot disclose your information or details without your express consent, not even to Rabobank.

*Advice Line Tel: 020 3117 2520*

*Website (includes link to online reporting): <https://protect-advice.org.uk/>*