

1. Policy and purpose

The PHP Group is committed to the highest standards of integrity, honesty and accountability and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide guidance as to how to raise any concerns.
- To reassure individuals that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

This policy is not an alternative mechanism for individuals to raise grievances. Personal grievances are employment issues and should be dealt with in accordance with the Group's Grievance Procedure.

2. Scope

This policy applies to all employees, temporary staff, contractors, external consultants and suppliers working under contract with the PHP Group of Companies.

3. Possible situations

Although this list is not exhaustive, examples of situations in which it might be appropriate for an individual to report a wrongdoing include:

- a breach, or potential breach, of health and safety legislation
- criminal activity

- failure to comply with legal obligations, including employment and labour concerns or un-ethical behaviour
- financial irregularities
- harassment of a colleague, customer or other individual
- an act of bribery
- deliberate concealment of any of the above.

4. Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager or key contact person at PHP. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your concerns have not been addressed, or you prefer not to raise it directly with your manager or key contact, you should contact one of the following:

- The Company Secretary; or
- Independent Audit Partner for PHP

Contact details are set out at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concerns. We will take down a written summary of your concerns and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. Confidentiality

We hope that individuals will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible

reprisals if their identity is revealed should discuss their concerns and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

6. Investigation and outcome

Once an individual has raised a concern it will be looked into carefully and thoroughly to assess what action, if any, should be taken. Individuals will be given as much feedback as possible, although the Group may not be able to provide all specific details as this could infringe upon the privacy of another individual.

The Group cannot guarantee that it will respond to all concerns in the way that individuals might wish, but the Group can guarantee that it will try to handle the matter fairly and properly.

7. Raising a concern externally

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, for PHP employees and associated persons (as outlined under 2 above). In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media.

The Group strongly encourages individuals to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

8. Safeguards

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support all those who raise genuine concerns under this policy, even if they turn out to be mistaken. An employee who raises a genuine concern under this policy will not suffer detrimental treatment as a result. If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

You should not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

9. Monitoring the Policy

Confidential records will be kept of all matters raised through this policy and the Board will receive reports with an assessment of the effectiveness of this policy.

10. Changes

The policies in this document including their content and procedures may be changed from time to time as necessary to meet any statutory amendments and the Group's business needs.

Employees will be notified of any changes with at least one month's notice by written communication, normally by the use of the organisation's e-mail system, although alternative communication methods may be used as appropriate.

Any employee who is uncertain on the procedures or with any query should in the first instance speak with their Manager.

11. Contacts

Company Secretary	Toby Newman 07729047959 Toby.Newman@phpgroup.co.uk
Independent Audit Partner, Deloitte	Daryl Winstone 07900 138957 darylwinstone@deloitte.co.uk
HR Plus (for internal PHP concerns)	Jo Payne 07436 332436 joanne.payne@plushr.com
Public Concern at Work	Independent Whistleblowing Charity Helpline (020) 7404 6609 whistle@pcaw.co.uk

Harry Hyman

CEO, Primary Health Properties PLC