

Whistleblowing

We're committed to creating an open and supportive culture. A place where we all feel able to be ourselves, realise our potential, and speak up when we see or experience anything that doesn't feel right.

Keeping us on the right track

Virgin Money's Whistleblowing Programme provides a safe, secure and straightforward way for colleagues to raise 'reportable' concerns (as defined by the Financial Conduct Authority). It can be done confidentially, anonymously and without fear of reprisal. This is particularly important when a colleague feels uncomfortable using standard communication channels, such as through their people leaders or human resources team. It's also important if they wish to remain anonymous, or believe they may suffer for raising their concerns.

The Bank has a Whistleblower Champion, who is a non-executive director of the Board and is chair of the Board Audit Committee. They are responsible for ensuring and overseeing the integrity, independence, and effectiveness of the Whistleblowing Programme, in line with regulatory and corporate governance code requirements.

The Standards we uphold

To make sure all colleagues understand their responsibilities around whistleblowing, we have what we call Standards, which are supported by Group-wide Policy Breach & Exemption Guidance.

Our whistleblowing Policy Standard applies to the entire Virgin Money Group. That includes our employees, contractors, agency workers, directors, suppliers and third parties. To help colleagues stay up-to-date, all must complete whistleblowing training at least once a year, with additional training for those involved in whistleblowing investigations.

Underpinning our whistleblowing Policy Standard are a number of key principles. Here's a summary:

- We regularly inform colleagues how they can raise their concerns through our Programme. They can also be raised confidentially with the FCA and PRA whistleblowing services, or other prescribed persons, as detailed on the government's [corporate governance](#) webpage.
- We protect and maintain confidentiality surrounding whistleblowing. This includes shielding the identity of people known (or thought) to have whistleblown, or who are the subject of a reportable concern. Plus we protect data or information associated with a reportable concern.
- We do not ask, speculate or try to find out if a colleague has whistleblown (if the reportable concerns are raised anonymously).
- We ensure a colleague is protected from any potential detriment or reprisal as a result of raising reportable concerns.
- We manage reportable concerns received through our Programme by communicating with whistleblowers where possible. Plus we ensure concerns are investigated thoroughly, independently and in a timely manner.

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- We take suitable corrective action that positively impacts our business, colleagues and customers, and which helps to maintain the integrity of the financial services industry.
- Where appropriate, we inform whistleblowers of the outcome and action taken in respect of the concerns they raised through our Programme.
- We provide a summary of reportable concerns received through our Programme to the Bank's Whistleblower Champion and Board Audit Committee, at least annually.

In addition to the protections from reprisal, whistleblowers may have additional legal protection. Under the Public Interest Disclosure Act 1998, workers are protected from detrimental treatment or victimisation from their employer if, in the public interest and with a reasonable belief, they blow the whistle on wrongdoing. Examples of wrongdoing are things like a criminal offence, fraud, failure to comply with any legal obligation, a miscarriage of justice, damage to the environment, danger to the health and safety of any individual, or deliberate concealment of information about any of these.

Record keeping

Records in relation to this policy are deemed 'high risk records'. They are kept in accordance with our Privacy and Data Protection Policy and Data Management Policy, and stored in line with our records retention schedule.

Non-compliance

Any failure to follow the requirements of our Policy Standard may lead to disciplinary action. This could result in dismissal if the conduct amounts to gross misconduct. We also report disciplinary action to the regulators if there has been a breach of the conduct rules.