THE BERKELEY GROUP HOLDINGS PLC
WHISTLEBLOWING POLICY

Introduction

The Berkeley Group is committed to high standards of openness, honesty and accountability. In line with that commitment we encourage employees and others with serious concerns about any aspect of The Berkeley Group's operations to come forward and voice those concerns without fear of victimisation, subsequent discrimination or disadvantage.

Purpose

This Whistleblowing Policy is intended to encourage and enable staff and others to raise serious concerns within The Berkeley Group rather than overlooking a problem or blowing the whistle outside.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures. Your concerns may be about something that:

- is unlawful; or
- is against The Berkeley Group policies; or
- amounts to sexual harassment; or
- falls below established standards or practice; or
- relates to unethical practices, such as modern slavery; or
- amounts to bribery, corruption, fraud, tax evasion or improper conduct.

Scope

The policy applies to all employees, workers, agents, contractors, sub-contractors, suppliers (at any tier of the supply chain), business partners and customers of The Berkeley Group Holdings plc, its operating companies and joint ventures.

The Main Board has overall responsibility for the effective operation of this policy.

Safeguards

Harassment or Victimisation	The Berkeley Group recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Berkeley Group will not tolerate harassment or victimisation and will do what it lawfully can to protect you when you raise a genuine concern.
Confidentiality	The Berkeley Group will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.
Anonymous Allegations	Anonymous allegations are difficult to investigate as by their nature they cannot be investigated fairly or credibly. Therefore, we hope that you will feel able to raise your concerns openly under this policy and we encourage you to do so.

Untrue Allegations	If you make an allegation you reasonably believe to be true, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make allegations you do not reasonably believe to be true, an investigation will take place to determine whether disciplinary or other action is taken against you.

How to Raise a Concern

Employees:

You should normally raise concerns with your immediate manager or their superior. However, if you believe that this is inappropriate as a result of the seriousness and sensitivity of the issues involved, you should raise your concern with the Group Solicitor, Wendy Pritchard or, in her absence, a solicitor within the Group Legal Department.

Others:

You should raise concerns with the Group Solicitor, Wendy Pritchard or, in her absence, a solicitor within the Group Legal Department (tel: 01932 868555 or e-mail: wendy.pritchard@berkeleygroup.co.uk address: The Berkeley Group Holdings plc, Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG)

The concern should be raised in writing, setting out the background and history of the concern, giving names, dates and places where possible, and the reasons why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet the appropriate person above.

Alternatively:

You can report a concern using our confidential reporting system which can be accessed via the link on our website.

How The Group Will Respond

If you raise a concern with the Group Solicitor or a solicitor in her department, the action taken by The Berkeley Group will depend on the nature of the concern and initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Within ten working days of a concern being received by the Group Solicitor, she will write to you acknowledging that the concern has been received and setting out the proposed course of action to be taken.

The Responsible Officer

The Group Solicitor maintains a record of concerns raised with her and the outcomes and will report as necessary to The Berkeley Group. If you request it, the Group Solicitor will do what she lawfully can to protect your identity but you should realise that she may be obliged to disclose it internally to the Main Board or Audit Committee or externally to the Police, the External Auditor or the Courts.

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R Stearn
Chief Executive

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