

Approved by the Ruffer LLP Board: 25 November 2020

1. About this policy

1.1 We are committed to conducting our business with honesty and integrity, with our clients at the centre of what we do, and we expect all staff to maintain high standards. Ruffer, however, acknowledges that all organisations face the risk of malpractice, or of unknowingly harbouring illegal or unethical conduct. We consider a culture of openness and transparency to be key to providing the best possible outcomes to our clients and to prevent or address instances of malpractice, unethical or illegal behaviour.

1.2 The aims of this policy are:

- to encourage staff to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate, as well as making it clear that confidentiality will be respected;
- to provide staff with guidance as to how to raise those concerns; and
- to reassure staff that they should be able to raise genuine concerns without fear of reprisals or victimisation, even if no instances of wrongdoing are found.

2. Who does this policy apply to?

2.1 This policy covers all staff. This includes partners, employees, officers, consultants, contractors, sub-contractors, volunteers, work experience, interns, casual workers and agency workers who are involved with the Ruffer Group (which includes Ruffer LLP and its subsidiaries).

2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. What is whistleblowing?

3.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes, but is not limited to, bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. This may include:

- Breach of a legal requirement – e.g. health and safety obligations owed by the Firm and/or an individual
- General malpractice – such as immoral, illegal or unethical conduct
- Gross misconduct
- Potential breach of requirements of legislation and FCA rules

- Potential breach of codes of conduct of all relevant professional institutions.

4. Protected disclosures

An individual making a “protected disclosure” is given statutory protection from victimisation under the Public Interest Disclosure Act 1998, provided that the disclosure is in the public interest.

A “protected disclosure” is any disclosure of information which – in the reasonable belief of the individual making the disclosure – tends to show that one or more of the following has been committed, is being committed or is likely to be committed. The disclosure must be made in accordance with certain conditions – these conditions are less onerous if the disclosure is made internally:

- A criminal offence
- A failure to comply with any legal obligation
- A miscarriage of justice
- The putting of someone’s health or safety in danger
- Damage to the environment
- Deliberate concealment of information relating to any of the above

It is irrelevant whether the information is confidential and whether the incident occurred, occurs or would occur in the UK, or elsewhere, and whether the law applying to it is that of the UK or any other country or territory. A legal obligation can include a contractual or other civil obligation as well as an obligation under criminal law. Certain instances of wrongdoing as described above under Section 3 – What is whistleblowing?, for example breaches of codes of conduct of professional institutions, do not constitute a protected disclosure. Staff should seek advice if unsure on this point. Please see contact details at the bottom of this Policy for Protect, who operate a confidential whistleblowing helpline.

5. How to raise a concern

- 5.1 We hope that in most cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Whistleblowing Champion (Fleur Meijs – Chair of the Audit Committee). Contact details are at the end of this policy.
- 5.2 You should make it clear that you are making your disclosure within the terms of the Firm’s whistleblowing policy. In doing so, the recipient of the disclosure will understand its nature, investigate the disclosure appropriately and take action to protect the whistleblower’s identity.
- 5.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for

confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

- 5.4 You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome, we will endeavour to handle your concern fairly and appropriately. By following this policy you can help us to achieve this. If you are not comfortable with the way in which your concern has been handled you can raise it with the Whistleblowing Champion.

6. Confidentiality

- 6.1 We endeavour to foster a culture of openness where staff feel they can openly raise concerns under this policy. However, staff should be assured that, should they wish to raise their concern confidentially, the firm will take all precautions necessary to keep their identity a secret. It will only be disclosed where necessary to those involved in the investigation.

- 6.2 We do not encourage staff to raise concerns anonymously. Proper investigation, and the establishment of credibility, may be more difficult or impossible if we cannot obtain further information from you. If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Whistleblowing Champion and appropriate measures can be taken to preserve confidentiality. Anonymous concerns will nevertheless be taken seriously and investigated as fully as possible. The Firm is not accountable for maintaining anonymity where you have told others of the alleged misdemeanour.

7. External disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

- 7.2 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 or other authority. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential whistleblowing helpline. Their contact details are at the end of this policy.

8. Protection and support for whistleblowers

- 8.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if no instances of wrongdoing are found.

- 8.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Champion immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

- 8.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action or further civil action from the affected party.

- 8.4 Should we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.
- 8.5 Safe Call operates a confidential whistleblowing helpline. Their contact details are at the end of this policy.

9. Contacts

Whistleblowing Champion	Fleur Meijs (Chair of the Audit and Risk Committees) 07740 633450 fmeijs@ruffier.co.uk
Safe Call (Independent whistleblowing organisation)	Telephone: From the UK – 0800 915 1571 From France – 00 800 72332255 From Hong Kong – 3077 5524 Website: https://www.safecall.co.uk/report
