

Quartz Housing Limited: Whistleblowing and Anti-Fraud Policy

Version:	v.1.2	Date Adopted:	April 2025
Policy Owner:	Board	Date Reviewed:	April 2025
Approved by:	Board	Next Review Due:	April 2026

1 | Introduction

- 1.1. The aim of this Policy is to encourage every Board member of Quartz and all contractors (including our managing agents) and suppliers to assist Quartz in tackling fraud, corruption, and other malpractice within the organisation and in setting standards of ethical conduct. These are very serious issues, and we are committed to tackling any malpractice within the organisation at all levels. Part of our strategy is to provide a way for you to report any concerns about malpractice to Quartz.
- 1.2. In this policy "we" means Quartz Housing Limited and "You" means every Board member of Quartz and all contractors (including our managing agents) and suppliers to Quartz.
- 1.3. The sorts of malpractice that we are concerned about include.
- Any fraud, money laundering, bribery or corruption;
 - Any irregularities involving accounting or other financial procedures;
 - The commission of any criminal offence;
 - Any conduct which is or may be in conflict with the organisation's interest such as involvement with a business competitor;
 - Any dishonesty or other irregularities in dealing with customers and suppliers;
 - Conduct which endangers the health and safety of employees and others working for the organisation
- 1.4. It is not possible to come up with an exhaustive definition of what we mean by malpractice and there may well be other issues of concern which we have not listed here but would nevertheless be considered as malpractice. You are encouraged to speak up if you have any concerns.

2 | Your Responsibility

2.1. Reporting

- 2.1.1. If you are you are aware of or suspect that there may be any sort of malpractice occurring within the organisation, we strongly encourage you to let the relevant person know about it.

- 2.1.2. In most cases, it should be possible for you to raise any concerns you have with the Chair. In the event that this is not possible, you should speak to the Vice Chair, or any other Independent Board Member designated in this policy from time to time.
- 2.1.3. It would not normally be appropriate to disclose your concerns outside the organisation or to a third party unless the procedures in this Policy have been followed first. If you are a worker engaged by Quartz and you disregard these procedures, any disclosure to a third party may be in breach of your obligations of confidentiality which form part of your relationship with us, and you may not qualify for statutory protection under the Public Interest Disclosure Act 1998 (the **Act**). In specified circumstances, the Act gives protection to workers who raise concerns about malpractice.

2.2. **Information**

- 2.2.1. We will investigate all concerns that are raised, even if they are raised anonymously. However, we would encourage you to give us more detailed information about your concerns including your name and details of the malpractice, including comments as to how you have been able to find out about the malpractice.
- 2.2.2. The more information that you can give us, the easier it is for us to progress our investigations. We will ensure that if you give your name, the person conducting the investigation will consider putting in place procedures to protect your identity. If you raise a concern on an anonymous basis, you should be aware that this may make it impossible for us to fully investigate your concerns.

3 | **Our Responsibilities**

3.1. **The investigation**

- 3.1.1. The person that you contact will investigate the concern that you have raised with them. In appropriate cases, the person you contact may appoint others, for example the police or external lawyers or auditors, to investigate your concern. The nature of the investigation will depend on the nature of the problem you have raised, but in each case we will do the following:
 - (a) Take a detailed note of your concern and, if possible, talk to you if more details are needed;
 - (b) Investigate your concern;
 - (c) Respect your confidentiality as far as possible. If you do raise a concern, the person that you contact will take all reasonable steps to keep your identity confidential. However, in order to ensure that we can fully investigate your concern, it may not be possible to guarantee absolute confidentiality;
 - (d) Give you feedback as to the conclusion of the investigation and, where possible, tell you what action, if any, has been taken.

3.2. Your position

3.2.1. As part of our commitment to tackling malpractice and encouraging people to speak out, it should be recognised that anyone who either:

- (a) Victimises or harasses someone as a result of that person genuinely raising a concern under this Policy;
- (b) Deters or attempts to deter employees or others from genuinely raising concerns under this Policy,

may be subject to disciplinary action or a relevant contract may be terminated, ending their relationship with us.

3.3. Protection

3.3.1. If you genuinely believe that there is some form of malpractice occurring within the organisation and you raise a concern in accordance with this Policy, we will ensure that you do not suffer any disadvantage in the workplace as a result of speaking out about your concerns.

3.3.2. It may be that a concern that you have raised turns out to be unfounded when investigated. This does not mean that you should not have raised your concern in the first place and therefore will not affect our policy to ensure that you do not suffer a disadvantage as a result of raising your concern.

3.3.3. In certain circumstances, you may also be protected under the provisions of the Act.

3.3.4. If you raise a concern which you know to be false and/or raise a concern solely out of malice, then disciplinary action may be taken against you or a relevant contract may be terminated, ending your relationship with us.

3.4. It is not possible to come up with an exhaustive definition of what we mean by malpractice and there may well be other issues of concern which we have not listed here but would nevertheless be considered as malpractice. You are encouraged to speak up if you have any concerns.

3.5. Board members of Quartz are aware of the need to maintain high standards of conduct and probity and should not do anything as a Board member which could give rise to suspicion of impropriety or appearance of improper conduct.

3.6. Quartz's articles of association set out requirements in respect of conflicts of interest and this policy is intended to work alongside those articles, and the Conflicts of Interest Policy.
