



Whistleblowing Policy Statement



Transition to
Net Zero



Our
People



Community
Connection



Governance
& Ethics

Whistleblowing Policy Statement

Speak Up – Raising Concerns Responsibly

At Portman Travel Group (PTG), we are committed to conducting business with honesty, integrity, and transparency. We encourage anyone connected with our business to speak up if they become aware of behaviour or activities that may be illegal, unethical, unsafe, or inconsistent with our values.

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within the company and alerts the employer or the relevant authority accordingly.

We encourage an open culture in all our dealings with employees, managers and all the people with whom we come into contact. Effective and honest communication is essential if malpractice is to be effectively dealt with.

The Public Interest Disclosure Act 1998

The Public Interest Disclosure Act 1998 (commonly known as the ‘Whistle Blowing’ Act) gives protection to individuals who make protected disclosures when they reasonably believe it is in the public interest for them to do so.

This Act sets out a framework to promote the responsible and protected disclosure of concerns if the individual reasonably believes:

- That a criminal offence has been committed, is being committed, or is likely to be committed.
- That a person has failed, is failing, or is likely to fail to comply with a legal obligation to which they are subject.
- That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- That the health and safety of an individual has been, is being, or is likely to be endangered.
- That the environment has been, is being, or is likely to be damaged.
- That information tending to show any matter falling within the matters above has been, is being, or is likely to be concealed.

The purpose of this policy is:

- To provide guidance for individuals wishing to make a disclosure
- To provide guidance around whistleblowing and what this may include.
- To encourage prompt resolution of all issues and concerns
- To reassure that confidentiality will be respected.
- To reassure individuals that they should be able to raise genuine whistleblowing concerns without fear of reprisals and/or retaliation, even if they turn out to be mistaken.

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

- Negligence in undertaking duties at work which put others at risk.
- Failure to comply with any legal or professional obligation or regulatory requirement.
- Actions resulting in financial irregularities or committing fraud.
- Actions which risk causing damage to the environment (internal and external).
- Committing a criminal offence.
- Engaging in conduct likely to damage our reputation or financial wellbeing.
- Deliberate concealment of any of the above

Our Commitment

We are committed to:

- Providing a safe and confidential way for concerns to be raised.
- Investigating all genuine concerns fairly and appropriately.
- Protecting individuals who raise concerns in good faith from retaliation, victimisation, or other detrimental treatment.
- Maintaining confidentiality wherever possible.
- Promoting a culture of openness, accountability, and ethical behaviour throughout our organisation.

Who Can Raise a Concern?

Our whistleblowing arrangements are available to employees, contractors, agency workers, consultants, interns, volunteers, suppliers, and other interested parties who interact with PTG and our businesses, including Clarity, Destination Sport, Elegant Resorts, If Only, and their subsidiaries.

How to Raise a Concern

Concerns can be raised internally through management escalation, Human Resources, or other appropriate senior contacts. We also provide an option for concerns to be submitted anonymously. External disclosures can also be made via the Portman Travel Group website reporting channel.

All reports are assessed and investigated in an appropriate and timely manner. We encourage individuals to provide as much information as possible to help us understand and investigate the matter effectively.

Protection for Whistleblowers

PTG will not tolerate retaliation against anyone who raises a genuine concern in good faith. This includes protection from dismissal, disciplinary action, threats, harassment, or other unfair treatment connected to making a report.

Anyone found to have retaliated against a whistleblower may be subject to disciplinary action.

Independent Advice

Individuals seeking independent advice on whistleblowing can contact Protect, the UK's independent whistleblowing charity:

- Helpline: 020 3117 2520
- Website: <https://protect-advice.org.uk>

Assurance

Portman Travel Group reviews its whistleblowing arrangements regularly to ensure they remain effective and aligned with legal requirements and best practice. We encourage anyone with concerns about wrongdoing to speak up, helping us maintain the highest standards of integrity and responsibility throughout our business.

Policy Statement

This policy statement and any associated documents are provided for general information only and do not constitute legal or other professional advice. They do not create contractual obligations or amend the terms of any agreement and should not be relied on as such. PTG may update this information from time to time and makes no representations or warranties (express or implied) that it is accurate, complete, or up to date. For further information, contact your relationship manager or GRC@portmantravelgroup.com. This statement is based primarily on UK/European requirements; additional local requirements may apply outside the UK/Europe.