

Bluefield Group (the “Company”)

Whistleblowing Policy

The Company is committed to running its business in a responsible and ethical way and takes any complaints in relation to malpractice seriously.

Whistleblowing is the disclosure by a person (including employees, trainees, agency staff or contractors) to an employer or an external body, about malpractice in a workplace or organisation. Unless relating to Bluefield Partners LLP, the Company’s Investment Adviser, malpractice (that has occurred or is likely to occur) that is connected or related to the Company can be disclosed on an anonymous or confidential basis to:

Kevin O’Connor
General Group Counsel Bluefield Partners LLP
6 New Street Square London,
EC4A 3BF
Phone: 020 7078 0020
Email: koconnor@bluefieldllp.com

Depending on the nature of the whistleblowing, the matter will be escalated to the Chair of the Company in the first instance, or if that is not appropriate, to the Senior Independent Director.

If you do not feel it appropriate to contact the General Group Counsel Bluefield Partners LLP and the disclosure to be made is relevant to Bluefield Partners LLP disclosure may be made to the FCA. The FCA’s whistleblowing processes is detailed on the following webpage <https://www.fca.org.uk/firms/whistleblowing>
Email: whistle@fca.org.uk

In writing to: Intelligence Department (Ref PIDA),
Financial Conduct Authority,
12 Endeavour Square,
London,
E20 1JN

Or complete the online form found at the following address:
<https://webform.clue.co.uk/fcawb>