



WHISTLEBLOWING & CONFIDENTIAL DISCLOSURES POLICY

**Version 1
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1. Who is a Whistleblower?

1.1. A whistleblower is a person who exposes secretive information or activity that is deemed illegal, unethical, or not correct within a private or public organization. The information of alleged wrongdoing can be classified in many ways: violation of company policy/rules, law, regulation, or threat to public interest/national security, as well as fraud, and corruption. Those who become whistleblowers can choose to bring information or allegations to surface either internally or externally.

2. What is a confidential disclosure?

2.1. A confidential disclosure is when you tell us information regarding a potential Anti-Money Laundering Regulations breach at a firm that you believe we should know but need to protect your identity by remaining anonymous.

2.2. Confidential disclosures can be made by both whistleblowers and those who do not consider themselves to be a whistleblower but have information they think they should share.

3. Using and protecting whistleblowers & providers of confidential disclosures.

3.1. We use a very wide range of information sources in our work and whistleblowers provide valuable intelligence in the regulated sector.

3.2. Whistleblowers almost always want their information and identity to be protected so when we work with them and use the information they give us, our overriding aim is to ensure that we treat them with the anonymity they need.

3.3. Unless whistleblowers choose to disclose their identity to the Regulated Firm concerned, we will do all we can to protect their identity, unless we are required by a court to disclose it. Even if we were required to disclose in court, we would try to limit the potential damage, for instance by disclosing only to the judge.

3.4. Likewise, we will treat those who provide us with confidential disclosures but do not identify themselves as a whistleblower in the same manner.

4. How we handle disclosures

- 4.1. We have a dedicated email address for whistleblowers to contact us with information, which will only be seen and monitored by a nominated person from the Enforcement Division, to ensure that a whistleblower's identity remains anonymous and protected.
- 4.2. Whistleblowers can provide us with information by emailing inconfidence@cara.ky or by post to **In Confidence at CARA**, 2nd floor, Century Yard, Cricket Square, P.O. Box 12236, Grand Cayman, KY1- 1010, Cayman Islands.
- 4.3. In many instances, a whistleblower's information simply corroborates intelligence we already have, or is new but not enough on its own to warrant further action, though it may draw our attention to a potential new risk. But sometimes we can use the whistleblower's information, pieced together with information from other sources, to take action.
- 4.4. Information from whistleblowing can also be used to inform our supervisory strategy.
- 4.5. We respond to all whistleblowers who approach us unless we think their anonymity would be undermined if we did so, or if they have not provided contact details. We also provide as much feedback to them as we can, although this is generally limited as a result of a range of matters including investigation sensitivity, policy and restrictions imposed by law.
- 4.6. In cases where we are able to publish outcomes of cases, and where a whistleblower's information has helped us, we expect to inform the whistleblower and thank them for their assistance. Cases where particularly serious or complex allegations are made may require face-to-face meetings with the whistleblower (if they agree).
- 4.7. We continue to invest in training staff to help us understand fully the concerns the whistleblowers raise.