

Group policies – Workplace policies

Our whistleblowing policy

We are committed to addressing employees' concerns at work.

Concerns such as dishonesty, corruption, financial malpractice, danger to colleagues, customers or the environment and other breaches of business principles can be difficult to resolve. This policy is designed to help employees address such suspicions and concerns where they feel that the interests of others or the Group are being put at risk.

Our assurances

If an employee raises a genuine concern under this policy, they will not be at risk of losing their job or suffering any form of retribution as a result. Providing they are acting in good faith, it does not matter if they are mistaken.

Making a false accusation or victimising an individual for raising a genuine concern will be treated as a disciplinary offence. An instruction to cover up an act of wrongdoing is also a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, an employee should not agree to remain silent as they will be afforded the full protection of this policy.

The board will not tolerate harassment or victimisation of anyone raising a genuine concern. We understand that employees may wish to raise a concern in confidence. If asked to protect their identity, we will not disclose it without their consent. Should the situation arise where we are not able to resolve the concern without revealing their identity, we will discuss with them whether or how we can best proceed.

How to raise a concern internally

1. **Contact line manager:** this may be done verbally or in writing.
2. **Contact line manager's line manager:** this step should be taken if the employee feels that they cannot raise the issue with their line manager or if they have done so and nothing appears to have been done. If the employee does not believe their line manager's manager is the appropriate person to contact, they should contact a senior manager and state whether they wish to raise the matter in confidence.
3. **Contact senior management:** if the employee has used these channels and still has concerns, or if they feel from the outset that the matter is so serious they are unable to discuss it with any of the individuals mentioned in steps one or two, they should contact either:
 - Group HR Director
 - Group Finance Director.

Employees will not be criticised for going above normal line management: their peace of mind is paramount.

Employees are entitled to take a colleague or employee representative to any meeting for support.

How we will handle the matter

Once the concern has been reported, we will look into it and assess what action should be taken. This may involve an internal enquiry or a more formal investigation. We will tell the employee who will handle the matter, how they can be contacted and whether their assistance may be needed. The employee can request a written summary of their concern and how we propose to move the matter forward.

The employee may be asked for their opinion as to how the issue might be resolved. If so, they should tell us at the outset of any personal interest in the matter. If it is clear that their concern falls more appropriately within the grievance procedure, they will be told at that time.

We will give the employee as much feedback as we possibly can. We may not be able to discuss the precise nature of our actions as this could infringe upon a duty of confidence we may owe to a third party or the provisions of the Data Protection Act.

Seeking independent advice

We have made arrangements with Public Concern at Work (PCAW), the leading organisation in this field, to provide employees with independent advice on how to raise concerns about serious malpractice at work.

Having read this policy, if an employee remains unsure about whether or how to raise a concern or wants to know about their legal position, they can telephone or e-mail PCAW, whose lawyers will provide confidential advice without charge. See contact information below for details.

How to raise a concern externally

While we hope this policy encourages employee to raise matters internally, there may be circumstances where they prefer to report issues to outside bodies, eg regulators or the police. In such cases PCAW will be able to advise on how to proceed. It should be noted that employees who make wider disclosures of this type will only be protected under the law in certain circumstances and legal advice should be taken before following this course of action.

If dissatisfied

If an employee is unhappy with the response to their concern, they should get in touch with one of the internal contacts listed on the intranet. We will do our best to handle the matter fairly and properly; if the employee is still unhappy, PCAW can advise on how to progress the matter externally.

Responsibilities

Everyone working within group companies is responsible for maintaining these standards. We hope that this policy gives our employees the confidence to raise any concerns whenever the best interests of the Group are at risk.

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Our whistleblowing policy cont.

Contacts

Internal contacts - step two		
Business area	Contact	Contact number
Group functions	These details are only available internally.	
Group Financial Services		
Argos		
Homebase		
All Group companies		

Internal contacts - step three	
Contact	Contact number
Group HR Director	These details are only available internally.
Group Finance Director	

External/Independent advice	
Public Concern at Work (PCAW) Employees with concerns about possible malpractice at work who are in need of advice can call or email for confidential advice from a lawyer	Telephone 020 7404 6609 e-mail advice21@pcaw.co.uk
BUPA Free and confidential advice is available from a trained counsellor for employees with concerns relating to bullying, harassment or stress.	Telephone 0800 371536