

DEBENHAMS GROUP WHISTLEBLOWING POLICY

INTRODUCTION

At Debenhams group we're committed to carrying out our business in a safe, honest and ethical way. The Group takes protecting its colleagues very seriously and aims to conduct its business with the highest standards of integrity and transparency at all times. Part of that is creating an open and supportive working environment where colleagues feel able to speak up about any suspected wrongdoing. This policy is in place to ensure that the people who work for and with us know how to raise concerns, and that they are protected when making a disclosure and will not suffer any detriment from doing so. This policy applies to all colleagues and anyone working with us.

WHAT IS WHISTLEBLOWING?

Whistleblowing is when a colleague knows, or reasonably suspects, that there is some wrongdoing occurring within or linked to the organisation and makes a disclosure in the public interest by alerting us or the relevant authority accordingly. Employees are protected by the Employment Rights Act 1996 which makes it automatically unfair to dismiss a worker for making a 'protected disclosure' and offers protection to individuals only where the disclosure is made in good faith.

WHAT YOU CAN DO

If you're concerned that any of the things listed below are happening, have happened or are likely to happen, we encourage you to raise this as soon as possible:

- A criminal offence has been or is likely to be committed
- Any violation of the Group's Modern Slavery policies and/or Debenhams's code of conduct
- Any failure to comply with an obligation set out in law
- A miscarriage of justice has occurred, is occurring or is likely to occur
- False accounting or reporting irregularities including wage and work hours
- Any health and safety concerns especially if harmful or dangerous to a person or persons
- Unacceptable work environments such as no heating, poor sanitation and housekeeping and no or poor building maintenance
- Unacceptable and dishonest work practices such as the use of unapproved subcontractors, homeworkers and individuals
- Racial, sexual, disability or other discrimination
- Evidence of bribery
- Damage to the environment and unethical environmental practices
- Covering up wrongdoing in the above categories

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This list is not exhaustive, and you should report any concerns that you may have even if your concern does not expressly appear in this list. Remember though, if you're an employee and you've got a personal complaint or concern, like about how you're being treated at work, this isn't a whistleblowing matter. It would be covered under the Grievance Procedure.

PROCEDURE FOR REPORTING A CONCERN

If you know, or suspect, that some wrongdoing is occurring then you should follow the process outlined below. You don't need to have any proof of any wrongdoing but, as long as you have a reasonable belief, you should report your concerns.

1. In the first instance we strongly encourage you to talk to your manager or the legal department (legal@boohoo.com) if you have a concern. In most circumstances issues can be raised and dealt with internally, either informally or through the Grievance Procedure.
2. If you would prefer to raise your issue with a confidential 3rd party, Debenham has provided access to 'Integrity Line'. Integrity Line is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

The easiest way to report a concern is by submitting a report on the Integrity Line secure website <https://boohoo.whistleblownetwork.net/frontpage>.

Integrity Line does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Integrity Line is available. In fact, Integrity Line is contractually committed not to pursue a reporter's identity. If you feel uncomfortable making a report on your work PC, you also have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the Integrity Line secure website.

You can also call Integrity Line on (0044) 161 532 4712 if you would prefer to speak to someone who is trained to receive a report about concerns in the workplace that you feel cannot be addressed in any other way. Your call will not be recorded and calls received by Integrity Line will be treated confidentially. You will be asked to provide the same information that you would provide on the web form and an interviewer will type your responses into the Integrity Line website.

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Integrity Line will share your report with specific individuals within the company who have responsibility for evaluating the report based on the type of violation and location of the incident. Each of these case managers has had training in keeping these reports in the utmost confidence.

When you file a report with Integrity Line you will be assigned a case ID and password. You can return to the Integrity Line system again, either from the website or telephone, and access the original report using your case ID and password to answer questions posed by a company representative or add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an “anonymous dialogue” where situations are not only identified, but can also be resolved, no matter how complex.

WHAT WILL HAPPEN ONCE A DISCLOSURE HAS BEEN MADE?

All concerns will be taken seriously, investigated appropriately, and treated confidentially.

- Once a concern has been raised Debenhams will make preliminary enquiries and decide if further investigation is needed. Any manager who is informed by a colleague of potential wrongdoing will take immediate steps to assess the situation, investigate and consider what action may be appropriate
- If further investigation is needed Debenhams, where possible, will advise and feedback any outcomes.
- The colleague who has raised the issue of a wrongdoing will be kept informed of any investigation that is taking place. They will also be informed of the outcome of the investigation taking into account data protection laws and the rights of other individuals involved. Therefore, it might not always be appropriate to tell the colleague who reported the wrongdoing the specific detail of any action that is taken, but they will be informed if action is taken.

PROTECTION FOR WHISTLEBLOWING AND SAFEGUARDS

- All disclosures will be treated in a confidential and sensitive manner. • All concerns will be treated in confidence and if you ask that your identity is protected it will not be disclosed without your consent. If you raise a potential wrongdoing in confidence, every effort will be made to keep your identity anonymous. If it is necessary to disclose your identity as part of the investigation, then this will be discussed with you beforehand.
- If you've reported a reasonable belief that any of the things listed above are happening, then don't worry – we won't allow you to be treated badly because of it. Any colleague who does report their concerns in good faith will not suffer detrimental treatment in anyway regardless of outcome, but deliberately raising false or malicious concerns will be viewed extremely seriously by the group. If we find that you've knowingly made a false allegation, we may deal with this under the Disciplinary policy

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- If you find out that a colleague has blown the whistle, you must not treat them badly because of it. If we think you might have done so, we'll need to investigate this and it may mean disciplinary action against you. You might also be at risk of being found personally liable for your behaviour.
- If you don't follow the procedure set out in this policy, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply to you.
- Disclosing information in an inappropriate way (e.g. contacting the media) could result in disciplinary action being taken against you, which could include dismissal.

EXTERNAL BODIES

If you're not satisfied with the response or because of the nature of the wrongdoing, you're entitled to and may wish to contact a relevant external body to express the concerns. In doing this, you should:

- Have a reasonable belief that the allegation is based on correct facts
- Not be making any personal gain from the revelations
- Make the disclosure to a relevant body

A "relevant body" is likely to be a regulatory body (eg the Health and Safety Executive, or the Financial Services Authority) but may, depending on the circumstances or concerns, include other organisations such as the police (on 101), the Modern Slavery Helpline (on 08000 121 700) or the Salvation Army's 24-hour Referral Helpline (on 030 0 303 8151).

If you want confidential advice at any stage, you may contact the independent charity Public Concern at Work on 020 7404 6609 or by email at helpline@pcaw.org.uk. Their lawyers can talk you through your options and help you raise a concern.

CONTACTING THE MEDIA

We would not categorise the media as a relevant external body. You should not contact the media with allegations about Debenhams group and if this is done without justification, we may deal with this under the Disciplinary policy.

ACTION TO BE TAKEN BY THE MANAGER

Any manager who is informed by a colleague of potential wrongdoing will take immediate steps to assess the situation, investigate and consider what action may be appropriate. If a colleague raises a potential wrongdoing in confidence, every effort will be made to keep the identity of the colleague anonymous. If it is necessary to disclose a colleague's identity as part of the investigation, then this will be discussed with the colleague beforehand.

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FURTHER SUPPORT

If you've got any questions regarding this policy, speak to your manager or get in touch with the HR team on HR.Burnley@boohoo.com or 01282 833042 or HR.Headoffice@boohoo.com or 0161 2374817 or Talent@prettylittlething.com.

Please be aware that this policy isn't contractual and may be amended at any time.