



HOME RETAIL GROUP WHISTLEBLOWING POLICY

1 Introduction

This policy is part of the Home Retail Group Business Principles which clarifies the standards expected within group companies and our commitment to addressing employees' concerns at work.

All of us at some time or another may have a concern about what is happening at work. Usually it is easily resolved. When it is about dishonesty, corruption, financial malpractice, danger to our colleagues, customers or environment, or other breaches of our Business Principles, it can be difficult to know what to do.

Understandably, you may be worried about raising these types of issues and may consider keeping such concerns to yourself. You may feel it is none of your business or that it is only a suspicion that may not be right. You may feel that raising your concern would be disloyal to colleagues, line managers or the Company. Conversely you may decide to say something only to find out you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

Raising concerns at the earliest possible moment rather than waiting for proof of your suspicions could prevent any wrong doing taking place, minimise the damage to individuals or the Company and relieve you of any anxiety. The Home Retail Group Board has introduced this policy because it treats potential malpractice at work as a very serious matter and it therefore wants to enable you to raise your concerns at an early stage and in the right way.

This "Whistleblowing" policy is primarily aimed at concerns about the interests of others or of the Company itself being at risk and where you believe we should know about it. It is not the process to use if you have a complaint about your personal circumstances. In such cases, you should follow the published Grievance Procedure for your business area or

refer to the Home Retail Group Bullying and Harassment Policy for guidance on such issues.

If you are in any doubt about what to do then please raise your concerns.

2 Scope of policy

This policy applies to all employees working within companies in the Home Retail Group.

3 Our assurances to you

Your Safety

The Home Retail Group Board is committed to this policy. If you raise a genuine concern under this policy, we will ensure that you will not be at risk of losing your job or suffering any form of retribution as a result. Providing you are acting in good faith it does not matter if you are mistaken. The Board does not extend this assurance to someone who maliciously raises a concern they know to be untrue.

Maliciously 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 wrong doing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent as you will be afforded the full protection of this policy.

We have designed this policy to give you the confidence to raise any genuine concerns you may have, safe in the knowledge that you will be fully protected.

Your Confidence

The Board will not tolerate harassment or victimisation of anyone raising a genuine concern. We understand you may wish to raise a concern in confidence under this policy. If you ask us to protect your identity by keeping your confidence we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity we will discuss with you whether or how we can best proceed.

If you do not tell us who you are it will be difficult for us to look into the matter, to protect

your position or give you feedback. We will consider anonymous reports but would rather know whom we are advising.

4 How to raise a concern internally

Step One

If you have a concern about malpractice we hope you would normally feel able to raise it with your line manager. You may do this verbally or in writing, whichever makes you feel most comfortable.

Step Two

If you feel you cannot raise the issue with your line manager, or if you have and nothing appears to have been done, you should contact your line manager's manager.

If you do not believe your line manager's manager is the appropriate person to contact, then you should contact one of the designated senior managers listed on the contacts page at the end of this policy. At that time you should say if you want to raise the matter in confidence so that appropriate arrangements may be made.

Step Three

If these channels have been followed and you still have concerns, or if you feel from the outset that the matter is so serious you are unable to discuss it with any of the individuals mentioned in steps one or two, please contact one of the following people:

- Home Retail Group HR Director
- Home Retail Group Finance Director

The Home Retail Group Board is not concerned as to which of these internal steps you decide to take. You will not be criticised for going above your normal line management. Your peace of mind is paramount.

You are entitled to take a fellow employee or an employee representative with you to any meeting if you feel you need additional support.

5 How we will handle the matter

Once you have told us of your concern we will look into it and assess what action should initially be taken. This may involve an internal enquiry or a more formal investigation. We will tell you who will handle the matter, how you can contact them and whether your further assistance may be needed. If you so request, we will write to you summarising your concern and setting out how we propose moving the matter forward.

When you raise your concern you may be asked for your opinion as to how the issue might be resolved. If you have any personal interest in the matter you should tell us at the outset. If it is clear that your concern falls more appropriately within the Company's Grievance Procedure we will tell you at that time.

While the purpose of the policy is to enable us to investigate possible malpractice and then take speedy and appropriate steps to deal with the problem, we will want to give you as much feedback as we possibly can. If you so request, we will confirm our response to you in writing. We may not be able to tell you 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.

6 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. If having read this policy you remain unsure about whether or how to raise your concern, or if you want to know about your legal position, you can telephone or e-mail **PCAW**. Their lawyers will give you confidential advice without charge. See the contacts page at the end of this policy for contact details.

7 Raising a concern externally

While we hope that this policy gives you the reassurance you need to raise matters internally, there may be circumstances when you can properly report issues to outside bodies e.g. regulators or the police. **PCAW** will be able to advise you on such an option and the circumstances in which you may be able to contact an outside body safely. It is important that you understand that employees who make wider disclosures of this type will only be protected under the law in certain circumstances. In your own interests we recommend that you take legal advice before following this course of action. Advice from **PCAW** will be given by a lawyer.

8 If you are dissatisfied

If you are unhappy with the response to your concern, you should contact one of the individuals listed under steps 2 or 3 in section 4 of this policy. While we cannot guarantee that we will always respond in the manner you might wish, we will do our best to handle the matter fairly and properly. If you are still unhappy about the way your concern has been dealt with internally, **PCAW** will be able to advise you on how you can progress it externally.

By using this policy when you have a concern you will help us achieve our Business Mission and support our commitment to our values.

Our Business Principles are about acting decently, honestly, loyally and treating each other with respect. They are about protecting our Company and enhancing its name and reputation.

9 Responsibilities

Everyone working within group companies is responsible for maintaining these standards and this policy allows us to do so safely and without fear. We hope that this policy will give you the confidence to raise any concerns where the best interests of the business are at risk.

WHISTLEBLOWING CONTACTS

Internal Whistleblowing Contacts - Step Two		
Business Area	Contact	Contact Number
Home Retail Group Functions	These details are only available internally	
Home Retail Group Financial Services		
Argos		
Homebase		
All Group companies		

Internal Whistleblowing Contacts - Step Three	
Contact	Contact Number
<ul style="list-style-type: none"> ▪ HR Director – Home Retail Group ▪ Finance Director – Home Retail Group 	These details are only available internally

External/Independent Advice	
<p>Public Concern at Work (PCAW)</p> <p>Home Retail Group employees with concerns about possible malpractice at work who are in need of advice on how best to 'Whistleblow' can call or email for confidential advice from a lawyer.</p> <p>BUPA</p>	<p>Telephone: 0207 404 6609</p> <p>E-mail: advice21@pcaw.co.uk</p>

Free & Confidential advice from a trained counsellor for employees with concerns related to bullying & harassment or stress.

Telephone:

0800 371536