



## **DFS Group Whistleblower Policy**

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### Version Control

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	L McDonald	Update approved by the Board	14/04/2021

### Review History

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	L McDonald	Next review April 2022	14/04/2021

### Reviewers

V	Reviewer Name	Reviewer Role	Review Date
	Mike Schmidt	Group CFO	14/04/2022

### Authorised by

V	Approver Name	Approver Role	Approved Date
	Group Board	Board of Directors	23/04/2021

### Related Documents

Document Name	Document Location

## **Whistleblowing Policy**

### **1. About this policy**

- 1.1 We are committed to conducting our business with honesty and integrity, and we expect all employees and contractors engaged in work for any member of the DFS Group to comply with our Group Code of Conduct and maintain the highest standards of conduct at all times. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The aims of this policy are:
- (a) To encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
  - (b) To provide colleagues with guidance as to how to raise those concerns.
  - (c) To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
  - (d) To comply fully with the obligations of the Public Interest Disclosure Act 1998.
- 1.3 This policy applies to any person working for any DFS Group company in any capacity, including all employees, officers, directors, consultants, contractors, volunteers, interns, apprentices, casual workers, seconded workers and agency workers.
- 1.4 This policy has been approved by the Board of Directors' of DFS Furniture PLC. It does not form part of any employee's contract of employment and we may amend it at any time.

### **2. Personnel responsible for the policy**

- 2.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2 The People Team has day-to-day operational responsibility for this policy, and must ensure that all managers and other colleagues who may deal with concerns or investigations under this policy receive regular and appropriate training.

2.3 All colleagues are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Colleagues are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the People Director.

### 3. What is whistleblowing?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- (a) criminal activity;
- (b) failure to comply with any legal or professional obligation or regulatory requirements;
- (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) damage to the environment;
- (f) bribery under our Anti-corruption and Bribery Policy;
- (g) facilitating tax evasion;
- (h) financial fraud or mismanagement;
- (i) breach of our internal policies and procedures, including our Code of Conduct;
- (j) conduct likely to damage our brand, reputation or financial wellbeing;
- (k) concerns that anyone is advising customers about furniture or optional services incorrectly, including deliberately misleading customers or not providing full explanations;
- (l) unauthorised disclosure of confidential information;
- (m) negligence;
- (n) the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

- 3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from either your line manager, or if this is not appropriate, your HR Business Partner.

#### **4. Raising a whistleblowing concern**

- 4.1 We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the People Team.
- 4.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should, in the first instance, contact one of the following:
- (a) the Group Whistleblowing hotline; or
  - (b) your HR Business Partner.

If you are not satisfied with the response you can escalate your concern to the Whistleblowing Officer Maxine Grainger, Group Head of Audit and Risk.

Contact details are set out at the end of this policy.

- 4.3 Whistleblowing concerns relating to the CEO will be managed by the Group Company Secretary on behalf of the Chairman of the Board.
- 4.4 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- 4.5 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

#### **5. Confidentiality**

- 5.1 We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every reasonable effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 4 and appropriate measures can then be taken to seek to preserve confidentiality. If you are in any doubt you can seek advice from our confidential hotline as part of our Employee Assistance Programme the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

## **6. Investigation and outcome**

6.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

6.2 In some cases we may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

6.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

6.4 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action, which could result in dismissal.

## **7. If you are not satisfied**

7.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

7.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4. Alternatively, you may contact Liz McDonald, Group General Counsel and Company Secretary. Contact details are set out at the end of this policy.

## **8. External disclosures**

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 8.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.
- 8.3 Whistleblowing concerns usually relate to the conduct of our colleagues, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. Whilst we encourage you to report such concerns internally first either to one of the named individuals in this policy or via the Whistleblowing hotline. If you do wish to contact an external party the details for [Protect](#) an independent whistleblowing charity who may be able to help you, are set out below.

## **9. Protection and support for whistleblowers**

- 9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager, or if this is not appropriate your HR Business Partner, immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 9.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action, which could result in your dismissal. In some cases the whistleblower could have a right to take legal actions against you personally for compensation in an Employment Tribunal.

**10. Contacts**

<b>Whistleblowing hotline</b>	Tel: <b>0333 212 3535</b>
<b>Employee Assistance Programme</b>	Tel (freephone): <b>0808 168 2143</b> Outside the UK: <b>+44 1452 673 138</b>
<b>Whistleblowing Officer: Group Head of Audit and Risk</b>	Maxine Grainger Email: Maxine.Grainger@sofology.co.uk Tel: <b>07788136853</b>
<b>Group General Counsel &amp; Company Secretary</b>	Liz McDonald Email: liz.mcdonald@dfs.co.uk Tel: <b>07849083971</b>
<b>Protect</b> (Independent whistleblowing charity formerly known as Public Concern at Work)	Helpline: <b>(020) 3117 2520</b> E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk