



# Wicket Group Plc - Whistleblowing Policy

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## What this policy addresses

This policy sets out our approach to whistleblowing. Whistleblowing protects our colleagues, customers, suppliers, other stakeholders and the Group by identifying and enabling us to address harm before it's too late and we strongly encourage anyone with concerns to bring these to our attention. This Policy does not form part of any employee's contract of employment and it may be amended at any time.

## Doing the right thing

- We will not tolerate wrongdoing or malpractice in our business.
- We will speak up about any serious concerns we have about any aspect of the company's activities or the conduct of colleagues, customers or suppliers without fear of victimisation, subsequent discrimination or disadvantage.

## What this means for you

- **Do** feel confident to question and speak up about anything in your work that makes you uncomfortable. For example, potential dangers to the health and safety of colleagues, sexual harassment, damage to the environment, fraud, theft, bribery, data breaches, money laundering, tax evasion, unethical practices, modern slavery, breaches of Company policies.
- **Do** raise your concerns with your line manager. If you are unable to do this, talk to another manager in the business or contact the anonymous, independent **Whistleblowing line on 0800 949 6396** or online **[Whistleblowing portal](#)**.
- For issues relating to your own employment, **Do** speak to your line manager or HR business partner, or follow the grievance procedure.
- **Do** complete your Business Ethics and all other assigned training.

## Investigation Process

The Company investigates all allegations made via the Whistleblowing service. Allegations are treated in confidence. Any person using the service will be issued with a unique password should they wish to be updated on progress, allowing them to remain anonymous. The outcome of a whistleblowing investigation will remain confidential.

## Where to go for help

Policies and guidance can be found on our colleague Intranet site under 'Company Policies' and you can speak to your line manager or contact the Legal team for advice. You can also seek advice from the independent charity, Protect, who provide a confidential helpline giving free legal and practical guidance to anyone who is genuinely concerned about malpractice in the workplace.



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## 1. Introduction

Wickes is committed to conducting business honestly, professionally and fairly. 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 and to address them when they do occur.

We aim to stop harm by encouraging safe whistleblowing. Whistleblowing protects colleagues, customers, suppliers, other stakeholders and the Group by identifying and enabling us to address harm before it's too late and we strongly encourage anyone with concerns to bring these to our attention..

## 2. Who this policy applies to

The Whistleblowing policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes Group plc ("the Company") and its subsidiaries (together "colleagues"). Customers, suppliers and other stakeholders are also welcome to call the Whistleblowing line to report any concerns.

## 3. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you've been treated at work. In these cases you should follow our Grievance Procedure or HR policies. If you are uncertain whether something is within the scope of this policy you should seek advice from your line manager or the Legal team.

## 4. How to raise a concern

We hope that in many cases you will be able to raise concerns with your line manager or another manager at Wickes. You may tell them in person or put the matter in writing if you prefer. They may be able to find a way of resolving your concern quickly and effectively. However, if you feel your line (or other) manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact our anonymous **Whistleblowing service via the helpline on 0800 949 6396** or via the **Whistleblowing portal**.



## 5. Confidentiality

We hope that colleagues will feel able to voice whistleblowing concerns openly. This helps us conduct a thorough investigation as completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

## 6. Investigation and outcome

The Company investigates all allegations made via the Whistleblowing line. Allegations are treated in confidence. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. In some cases we may appoint an investigator or team of investigators which may include colleagues. We may also ask you to provide more information. If you wish to remain anonymous, you will be given a unique password and you can contact the Whistleblowing helpline and use this to find out the progress of the assessment.

Sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. Any information you are given should be treated as confidential.

While we cannot guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. If you are not satisfied with the way in which your concern has been handled, you can raise this with the General Counsel & Company Secretary or Director of Legal & Governance.

We expect that any colleague using this procedure to raise a disclosure will do so in good faith and will have a reason for believing that grounds for concern exist. No colleague who discloses information in good faith under this procedure will suffer reprisals or victimisation nor will they suffer any detrimental treatment as a result of the disclosure. If a concern is raised in good faith, but after investigation it turns out that there is a genuine and innocent explanation for the matter of concern, the matter will simply be treated as closed. The fact of having raised the concern will in no sense reflect badly on the relevant colleague.

However, if we conclude that a whistleblower had made false allegations maliciously, the whistleblower may be subject to disciplinary action.

## 7. External disclosures

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.



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. We strongly encourage you to seek advice before reporting a concern to anyone outside of Wickes. Protect, an independent whistleblowing charity, operates a confidential helpline and you can contact them by telephone: 020 3117 2520 or find more information on their website: [protect-advice.org.uk](https://www.protect-advice.org.uk)

Whistleblowing concerns usually relate to the conduct of colleagues but they may sometimes relate to the actions of third parties, such as customers or suppliers. We encourage you to report concerns about third parties internally to your line manager before taking other action.

## 8. Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy. Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the General Counsel & Company Secretary or Director of Legal & Governance immediately. 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.

If you ever feel desperate or in need of support remember that all colleagues have access to free, confidential 24/7 support through our Wickes Employee Assistance Programme (EAP) line on 0800 0155 630.

## 9. Training and Communication

Whistleblowing is covered in all legal and compliance e-learning modules which colleagues are required to complete, including Business Ethics which is compulsory for all colleagues to complete as part of their induction and annually thereafter. This ensures that everyone understands how to raise a concern. Details of the whistleblowing service are included throughout e-learning modules and colleagues are asked to actively confirm at the end of each module that they know how to speak up if they see or suspect something that isn't right.

We carry out regular colleague communication throughout the year on whistleblowing and include details on posters of how to raise a concern, which are placed in all Wickes stores, distribution centres and offices.

Suppliers can access details of our whistleblowing service through the Supplier Code of Conduct, the Supplier Manual or through the Supplier portal - iSupply.





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## 10. Frequently Asked Questions

**Q1. How do I raise a whistleblowing complaint?**

Whistleblowing complaints can be raised through your line manager, the Legal team, the [Whistleblowing portal](#) or the Whistleblowing helpline on **0800 949 6396**.

**Q2. What do I do once I've raised a complaint?**

If you have raised a complaint using the Whistleblowing portal or the helpline, please check the Whistleblowing portal at least once a week to monitor the status of the case and in particular, to check whether any further information is required.

**Q3. How long will my complaint take to be investigated?**

We will endeavour to investigate the complaint as efficiently as we can. We cannot give a specific timeframe as each complaint differs in its complexity.

**Q4. Will I be kept up to date on the progress of my complaint?**

The portal records when an investigation has been concluded, but the outcome cannot be shared due to confidentiality. In some cases, more information may be required to assist the investigation, please check the Whistleblowing portal at least once a week to either provide the necessary information.

**Q5. How will I be contacted about my complaint?**

All communications regarding the case will be through the Whistleblowing portal.

**Q6. What happens if the situation which I complained about still continues after the investigation has completed?**

If you are able to provide new evidence, we will consider whether it is appropriate to carry out a further investigation.



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