



Corporate Governance

# Group Whistleblowing policy

<b>Owner</b>	Chief People Officer and Group General Counsel
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## INTRODUCTION

We are committed to achieving and maintaining high standards with regard to behaviour at work, service to the public and ethical working practices. Employees are expected to conduct themselves with integrity, impartiality and honesty, and are empowered and encouraged to challenge inappropriate behaviour or unethical practice at all levels. When confronted with a situation where you think the standards have not been met, the expectation is that you use sound judgment to make an ethical decision that will reflect well on both you as an individual and the Company.

We operate a Whistleblowing Policy and procedure for reporting genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work, without fear of intimidation or victimisation.

This policy is designed to provide employees with a channel to report serious concerns, and to protect both employees and the business from any risk associated with misconduct. In addition, the Whistleblowing procedure document is designed to support employees in raising any concerns by guiding them to the correct process to follow.

Any employment, colleague or personal grievance, or work-related issues should be raised through the local Grievance policy.

This policy applies to all employees across the Group.

The policy also applies to contractors, agents, consultants or any others working for or on behalf of SIG plc.

*In this document 'SIG' and 'Company' refers to SIG plc and its affiliate companies. 'Our' and 'we' refers to SIG plc'*

## PRINCIPLES OF WHISTLEBLOWING

Whistleblowing is defined as raising a concern or disclosing wrongdoing that is in the public interest. This means that it must affect others, for example, the general public.

It is imperative that any concerns regarding actual or suspected wrongdoing at work is reported.

We encourage all employees to make use of the Whistleblowing Policy and procedure, which is in place to provide a channel through which employees can report concerns with confidence.

Employees should make sure they are aware of the procedure, which is supplemented by a Whistleblowing Procedure Guidance note, and should be assured that in order to support the delivery of high standards and ethical work practices, they are empowered to raise concerns.

Examples of wrongdoing include:

- a criminal act
- actions which constitute bribery or corruption
- failure to comply with a legal obligation
- malpractice, illegal acts or failures to comply with recognised standards of work
- suspected fraud
- accounting or financial irregularity
- a breach of the Code of Conduct or another SIG policy
- a miscarriage of justice
- confidential, or commercially sensitive information being used improperly
- using insider information improperly
- dealing in SIG shares improperly
- failure by SIG to comply with the Listing Rules or the Market Abuse Regulation
- a failure to disclose or the destruction of information or documents which should be disclosed to others within SIG or to appropriate regulators
- acts that present a Health and Safety risk, or a risk of damage to the environment
- a deliberate attempt to cover up any wrongdoing

Any matter raised under the Whistleblowing Policy will be investigated thoroughly and in a timely manner.

Where possible, every effort will be made to protect confidentiality, particularly against disclosing individuals' details to those against whom there is an allegation. However, sometimes, in order to conduct a thorough investigation, it may be necessary to disclose information or an individual's identity. This will only happen if it is absolutely necessary. If it is likely that your identity will be revealed, you will be informed in a timely manner and every effort will be made to support you through the process.

**No employee will be penalised for raising a genuine concern through this process. In addition, the employment, rights and opportunities, for example development, training or career progression, for any employee raising a concern will not be affected. However, if you are implicated in some way in any wrongdoing, you may be subject to disciplinary procedures.**

**In addition, we will not tolerate any harassment, victimisation or ill treatment of anyone raising a genuine concern under this policy. If this occurs, disciplinary procedures will apply.**

Any employee who is found to make false allegations maliciously or in bad faith may be subject to disciplinary procedures, up to and including dismissal from the Company. In addition, any employee found to have deliberately concealed or contributed to any wrongdoing may also be subject to disciplinary procedures.

Any matters that you wish to raise that do not constitute malpractice, for example employment, colleague or work-related matters should be raised through the Grievance process. For more information, refer to your local Grievance policy or, alternatively, please see your local HR representative.

## **WHISTLEBLOWING PROCEDURE**

There are a number of ways in which you can report a concern.

### **Internal channels**

In the first instance, you should raise your concerns with your line manager.

If you do not feel comfortable doing this, you should see your local HR representative. Alternatively, you can contact the Group Chief People Officer or the Group General Counsel who are the nominated executives for dealing with concerns raised under this policy.

Your identity will not be revealed unless absolutely necessary.

### **External channels**

If you do not wish to raise your concerns with an internal, senior leader, you can use our external partner, Navex, which is an independent body that provides a confidential hotline for reporting concerns. Navex operates in the countries in which we are based, and if you call, you can speak to a local country representative.

You can raise your concerns in confidence by getting in touch using the following options.

**Via telephone:**

Belgium	0800 79 901
France	0805 08 19 18
Germany	0800 8114790
Ireland & Northern Ireland	1800 903 314
Netherlands	0800 0231946
Poland	800-005-051
Great Britain	0800 069 8009

**Via our dedicated online site:**

[sigwhistleblowing.ethicspoint.com](http://sigwhistleblowing.ethicspoint.com)

For a process flow which supports in deciding upon the most appropriate channel to follow, depending on the concern you wish to raise, please see the Group Whistleblowing Procedure Guide.

## INVESTIGATIONS

On receiving a report through the Whistleblowing procedure, the Company will respond in a responsible and appropriate manner under this policy. An investigation will be conducted as speedily and sensitively as possible. An official written record will be kept at each stage of the procedure.

Any data relating to individuals as part of the investigation process will be managed, stored and deleted in accordance with the Group and local General Data Protection Regulation (GDPR) policies. For further information, please see the Group General Data Protection Regulation (GDPR) Policy.

A decision as to whether a preliminary investigation should be carried out will be made as soon as possible following receipt of the report. The individual reporting the concern will be informed on timescales.

Your line manager or the person to whom you have raised the concern will investigate your concern as follows:

- If appropriate, an initial interview will be arranged as soon as possible after receiving the complaint to ascertain your area/s of concern.
- The notes taken during the interview will be sent to you to approve as an accurate record of what was discussed.
- You will be asked whether you want your identity to be disclosed.
- You will be asked if you are prepared to make a verbal or written statement, in addition to the notes of your interview (if you have not already done so).
- Your line manager, a more senior director or an external person or body, as appropriate, will then conduct further investigations. The investigation may be conducted by a separate function within SIG, such as Group Risk and Assurance, for example in the case of financial irregularity or suspected fraud. They will aim to complete the investigation as soon as possible. The length of investigation may depend on the level of seriousness or complexity of the case.
- The person against whom the disclosure is made will normally be told at an early stage, provided with supporting evidence and allowed to respond. However, it may be necessary to conduct the investigation in confidence (i.e. without informing the subject of your allegation/s) until (or if) it becomes necessary to do so. Alternatively, depending on the nature and seriousness of the complaint, the person/s against whom the allegation/s is made may be suspended while investigations are undertaken.

You are entitled to be accompanied by your union representative (if any) or a work colleague throughout the procedure when reporting your concerns.

Anonymous concerns will be investigated in the same way, as long as there is sufficient information available to allow the Company to do so. You should be aware that if you report your concern anonymously it can be more difficult to investigate your claims where the information available is insufficient.

### **Concerns raised by external parties**

External parties, for example customers, suppliers, prospective employees or the general public can also raise any concerns through the Whistleblowing procedure.

Concerns should be reported to the Group Chief People Officer or the Group General Counsel, who are the nominated Executives with responsibility for dealing with concerns raised under this policy. Any concerns reported will be investigated fully.

## **Outcomes of investigation**

At the conclusion of any investigation, you will be informed of the outcome to the extent allowable by law. The exact nature of any disciplinary action taken against any person will remain confidential.

## **FURTHER GUIDANCE AND SUPPORT**

If you have any questions on the content of this policy, or need further guidance or support, please contact your local HR representative.

You can also find further information in the following related documents:

- Group Whistleblowing Procedure Guide
- Group Code of Conduct