

HOBBS

WHISTLEBLOWING POLICY

INTRODUCTION

Hobbs encourages a free and open culture in its dealings between its employees and all people with whom it engages in business and legal relations. In particular the Company recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Company's success ensured.

We would expect every employee to speak up about genuine concerns in relation to; criminal activity; breach of a legal obligation (including negligence and breach of contract); miscarriage of justice; danger to health and safety or the environment; discrimination, victimisation or harassment, extending to modern slavery and the cover up of any of these in the workplace. This applies whether or not the information is confidential.

Hobbs is committed to ensuring that any employee concerns of this nature will be taken seriously and investigated. A disclosure to the company will be protected if the employee has an honest and reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur. Employees who raise concerns reasonably and responsibly will not be penalised in any way.

The policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

WHO THIS POLICY IS FOR

This policy is for people employed by the Hobbs Group. For the purposes of this policy only, this is someone who is:

- Employed on a permanent or fixed term contract of employment
- On a temporary contract or employed through an agency to work for Hobbs
- An independent consultant for Hobbs
- Contractors and suppliers of services and goods to Hobbs

WHISTLEBLOWING PROCEDURE

Any individual who has reasonable suspicions of malpractice should contact their line manager or, in their absence or in any other circumstances the HR department. It is recognised that for some individuals, raising a concern under this procedure may be a daunting and difficult experience.

All reported incidents will be investigated. All reports will be dealt with in confidence, with only employees that need to know, being informed. Hobbs will establish and record the basis of the concerns that have been raised and establish what further actions are required. The individual raising the concern will be advised of the outcome of the investigation as soon as possible, normally within four weeks of the date of their disclosure. Where a longer period is needed for investigation, the employee will be informed in writing.

If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the HR Manager, who will arrange any further investigation as they feel appropriate and who will respond in writing.

EXAMPLES OF WHEN TO USE THE WHISTLEBLOWING POLICY

The list below give some examples of activities that constitute misconduct or malpractice that Hobbs would expect to be reported, but this list is not exhaustive:

- Conduct which is an offence or breach of the law
- Failure to comply with legal obligations
- Actions which endanger the health and safety of employees or the public
- Action which cause damage to the environment
- Actions that could amount to fraud, for example, when someone unlawfully converts to their own use; the property or assets of the Business
- Actions that could amount to corruption, for example, contracts or consultancy agreements which are offered and accepted for a reward and which lead to gain for the person offering the inducement
- Actions that are intended to conceal any of the above

GUIDING PRINCIPLES

To assure employees that the concern will be taken seriously, Hobbs will:

- not allow the person raising the concern to be victimised for doing so
- treat victimisation of whistleblowers as a serious matter, that may lead to disciplinary action, including dismissal
- not attempt to conceal evidence of poor or unacceptable practice or misconduct
- take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct
- ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistle blowing

Employees who feel unsure about whether or how to raise a concern or want confidential advice can contact the HR department or the Confidential Retail Trust Helpline, where expert, confidential advice is available at any time. This telephone number can be found on the team notice board.

JACQUELINE ROUSE

HR Director