



Dunelm Group plc
Speak Up - Whistleblowing Policy
(Reporting of potential wrongdoing)

DUNELM CONDUCTS ITS BUSINESS WITH HIGH STANDARDS OF INTEGRITY AND HONESTY AND EXPECTS THE SAME STANDARDS FROM ALL COLLEAGUES, CONTRACTORS AND SUPPLIERS.

You may be the first to know when someone at or connected with Dunelm (e.g. our suppliers) is doing something illegal or improper, but may feel apprehensive about voicing your concerns. This may be because you perceive that speaking up might be seen as disloyal, or it may be that you do not think that your concerns would be taken seriously. Be assured that Dunelm does not believe that it is in anyone's interest for an individual with knowledge of wrongdoing to remain silent and the aim of this policy is to ensure that you are fully aware of how to raise concerns about any actual or suspected wrongdoing and the process when you do so.

What Should I Report?

You should report where you reasonably believe any one or more of the following has or may have taken place:

- A criminal offence.
- Breach of any legal or regulatory obligation, including those relating to bribery, corruption and tax evasion.
- Danger to the health and safety of any individual.
- Deliberate breach of Dunelm's rules, codes of conduct or policies.
- Dishonesty.
- Miscarriage of justice.

- Breach of environmental protection laws.
- Breach of financial controls, false accounting or reporting irregularities, fraud or tax evasion.
- Deliberate concealment of any wrongdoing.

Please note that:

- For any matter to be investigated as whistleblowing under this policy, there is also the requirement for the concern to be in the public interest i.e. it affects other people, not only the individual raising it.
- It is not the responsibility of the individual raising the concern to investigate, that is Dunelm's responsibility.
- If an individual's concern relates to their Terms and Conditions of Employment, or is a disciplinary matter or grievance, this should be raised under Dunelm's Grievance Policy. Matters relating to harassment, bullying or victimisation should be dealt with through the Dunelm Equality and Diversity Policy.
- Deliberately raising false or malicious allegations is not acceptable and anyone making such allegations will be dealt with in accordance with the Company's Disciplinary Policy and Procedure. This could result in formal action up to and including dismissal for the individual that raised the matter.

How Do I Report?

If you become aware of wrongdoing of the type outlined above, you are encouraged to 'Speak Up' and report it confidentially via the Navex platform (details can also be found on the poster at your primary place of work):



How to contact us

-  **dunelm.navexone.eu**
-  **dunelm.ethicspoint.com**
-  **Dial 0800-89-0011,
then dial 833-646-1614**

Navex is an independent, third party which provides Dunelm's whistleblowing/reporting service. You should be aware that your personal data may be processed by Navex by virtue of them providing the whistleblowing/reporting service. There are robust provisions in place to ensure that any data provided as part of the reporting process is protected.

Once you make a report, Navex will issue you with a unique reference that allows you to get back in touch with them, update your report, or respond to requests for further information, even if you have reported anonymously.

Can I Remain Anonymous?

While it is preferable to deal with concerns openly, we recognise that this will not always be possible and you may wish to raise concerns in confidence or anonymously. If you do raise a concern anonymously or in confidence, we will not disclose your identity unless required by law. If this happens, we will discuss with you how to proceed.

However, please be aware that we cannot guarantee that colleagues or the people involved in your concern will not be able to deduce your identity. If it is likely that colleagues or other people will be able to work out that you have raised a concern, dealing with the matter openly may be the best option. Please also note that if you do not tell us who you are, it may impact our ability to look into the matter effectively. It also may make it harder to protect your position should someone guess your identity.

What Happens Next?

Once you have reported your concerns, preliminary enquiries will be made to determine if further investigation is needed.

Within scope: Where the reported matter is within the scope of this policy and requires investigation, the Company Secretary will determine the appropriate approach to be taken to the investigation¹.

¹ Steps are in place (approved by the Dunelm Group Plc Audit & Risk Committee) to prevent those persons who manage, oversee, monitor and/or receive reporting on any aspect of the 'Speak Up' process from receiving, reviewing or investigating any matter that relates to them.

An investigation may include, but not be limited to:

- Carrying out interviews with other individuals (ensuring anonymity, confidentiality and independence is maintained); and
- Seeking further information from you, either in writing or over the phone depending on your communication preference.

No individuals named in the report will be involved in any aspect of the investigation process. Reasonable endeavours will be made to ensure that whistleblowing investigations take place in a timely manner, it being acknowledged that time taken will, amongst other things, depend on the extent of information available, the complexity of the matter and the specific circumstances of the matter/s raised.

In instances where Dunelm reasonably believes that the matter may contain information that concerns public safety or otherwise requires reporting to an external body, Dunelm reserves the right to raise the relevant concerns directly with the appropriate authority.

Outside of scope: Where the reported matter is not within the scope of this policy and/or is not appropriate to be investigated, a response will be provided (via the Navex platform) explaining that it is outside of scope but (if applicable) has been passed on for investigation by the relevant team (for example, the People Team).

The Navex platform may be used to continue to communicate with you if you have remained anonymous and further information is required from you in the course of an investigation (even in circumstances where it has

been acknowledged that the investigation is outside the scope of this policy).

Details of the investigation and the final outcome will not be disclosed to you, unless the Company Secretary agrees that it is feasible and appropriate to do so.

Where Can I Get Further Help?

Dunelm encourages individuals to raise concerns internally through this 'Speak Up' process in the first instance. However, individuals are entitled to raise their concerns with external agencies as appropriate, such as Public Concern at Work, a charity concerned with promoting compliance with the law, which offers free, independent, confidential advice (telephone 0207 4046609 or email helpline@pcaw.co.uk), Citizen's Advice, the Advisory, Conciliation and Arbitration Service (ACAS), Protect Advice or, specifically for credit-related matters, the FCA.

If you have reported concerns under this policy and believe that you are being disadvantaged in any way as a result, this must be reported to your Manager, the People Department or the Company Secretary. Victimising individuals or deterring them from raising concerns in good faith under this policy will be dealt with in accordance with the Company's Disciplinary Policy and Procedure and could result in formal action up to and including dismissal.

If you have any questions about this policy or would like more information about the procedure that is followed in relation to the investigation of matters raised under this policy, please contact the Company Secretary.