

Whistleblowing Policy

Purpose

Encompassing our core values is our commitment to always act with honesty and integrity. We recognise, however, that despite this commitment instances of misconduct can occur. You are encouraged to speak up as soon as you observe, or suspect, misconduct or any other activity that may pose a risk to Urgo's reputation: the quicker you report it, the quicker we can take corrective action. This Policy explains how to share your concerns in good faith without fear of retaliation and what happens after raising a concern. All concerns will be taken seriously, investigated appropriately and acted upon where necessary.

Scope

This Policy is applicable to all Urgo employees, contractors and sub-contractors, as well as third parties. It is your duty to speak up if you observe, or suspect, misconduct or any other activity that may pose a risk to Urgo's reputation – this means actual or suspected violations of our policies and the laws that govern our organisation. Examples of matters that should be raised under this Policy include: -

- Financial malpractice, impropriety or fraud;
- Dangers to health and safety or the environment;
- Conflicts of interest;
- Criminal or illegal activity such as money laundering, violation of sanction laws, breaches of competition law, bribery and insider trading;
- Human rights violations;
- Discrimination, harassment or sexual harassment;
- Deliberate concealment of any violations, such as those listed above;
- Retaliation against anyone speaking up in good faith or assisting in an investigation.

This Policy should **not** be used to report: -

- Events presenting an immediate threat to life or property. For emergency assistance, contact the local authorities or emergency services.
- Grievances in relation to your terms of employment or personal disputes. For these matters please refer to the Grievance Policy.

Policy Statement

How to speak up

There are several ways to raise your concerns of misconduct in good faith. Good faith means that you reasonably believe or suspect that there has been, or will be, a breach of our Policies or the law.

1. Generally, the first person to approach when raising a concern is your **line manager**, who may be able to address your concern or engage the appropriate individual or team who can.
2. If approaching your line manager is inappropriate, for whatever reason, then you should raise your concern with any **member of the Senior Leadership Team** or **member of the HR team**.

- Alternatively, you can report your concerns alerte.compliance@group.urgo.com providing as much detail as possible about the nature of your concern and allow us to take the appropriate action. Don't worry if you don't have all the facts and do not attempt to investigate the matter yourself: we encourage you to let us know your reasons for concern and allow us to take the appropriate action.

As a matter of principle, your identity and the details of your concern will be kept confidential and shared only as necessary to deal with the concern. Any personal data collected as part of this Policy will be processed in accordance with relevant legislation.

You have raised your concerns, what happens next?

Once your concern has been raised, the details of your concern will be logged in our case management system. Your concern will then be promptly assessed if it falls under the scope of this Policy, it will be investigated in a fair and unbiased manner. We aim to conclude all investigations in a timely manner, with the timescales dependent on the complexity of the investigation. We encourage you to cooperate if you become involved in an investigation. If you participate in or come to learn of an investigation, you must keep it confidential.

If you raise a concern and we are able to contact you, you will be informed when the case has concluded. However, to preserve confidentiality, observe legal requirements and protect the privacy of all concerned we will not share the detailed findings. If your concern is substantiated, appropriate measures (including disciplinary action, if warranted) will be taken in accordance with local law and policy.

You will be protected for speaking up in good faith

We value the help of those who report concerns in good faith. Retaliation (both direct or indirect) for speaking up or cooperating in the investigation is not tolerated and will lead to disciplinary action. This protection does not extend to reports made with ill intent, for personal benefit or with malice. If you are concerned that you are being retaliated against, report this as per this Policy.

Contact Information

If you are ever in doubt about the right course of action, or if you have questions about this Policy, please consult a member of the HR Team.

Revisions & Approval History

Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
Issued	1	August 2013	Launch of Policy
Revised	5	July 2023	Policy made more succinct. Clear distinction between Whistleblowing and Grievance process

Approval History

Role	Name	Title	Date of Approval
Author	Rabinder Kaur	HR Manager	n/a
Owner	Stefan Cubitt	UK&I General Manager	n/a
Approver	Stefan Cubitt	UK&I General Manager	3 rd July 2023