





DFS Group Whistleblower Policy DFS Furniture PLC

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Related Documents

Document Name	Document Location
Grievance Procedure Inappropriate Behaviour Including Bullying, Discrimination, Harassment & Victimisation Policy	Can be found on: The Hub

1. Purpose

At DFS Group, we are committed to conducting our business with honesty and integrity and expect all employees and contractors to comply with our Group Code of Conduct. While issues can arise in any organisation, a culture of openness and accountability helps prevent such situations and to appropriately address them.

You might be the first to notice if something seems wrong, whether it is occurring within the DFS Group or through a partner. It is natural to feel unsure about speaking up, but raising concerns is the right thing to do. This policy outlines how to report concerns and what to expect.

It aims to:

- (a) To encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide colleagues with guidance as to how to raise those concerns.
- (c) To reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- (d) To provide a fair and consistent process that complies fully with the obligations of the Public Interest Disclosure Act 1998.

2. Scope

This policy applies to any person working for any DFS Group company in any capacity, including all employees, officers, directors, consultants, contractors, volunteers, interns, apprentices, casual workers, seconded workers and agency workers, and suppliers.

3. What is Whistleblowing?

Whistleblowing involves raising concerns that it is reasonably believed shows wrongdoing, illegal activities, unethical behaviour, or violations of company policies or laws that affect the organisation, its employees, customers, or stakeholders.

To qualify as whistleblowing, the concern must be made in the public interest, meaning it relates to issues beyond the individual raising it and potentially harm the company, its employees, customers, or stakeholders.

This policy is not intended for complaints about personal treatment at work; such matters should be addressed through the Grievance Procedure or the Inappropriate Behaviour Including Bullying, Discrimination, Harassment & Victimisation Policy as appropriate. *These Policies can be found on 'The Hub'*.

4. What should I report?

You should report any concern, e.g. suspected misconduct, malpractice, or dangers at work, including but not limited to:

- criminal activity.
- failure to comply with any legal or professional obligation or regulatory requirements.
- miscarriages of justice.
- danger to health and safety.
- damage to the environment.
- Breaches of our Anti-corruption and Bribery Policy.
- facilitating tax evasion.
- financial fraud or mismanagement.
- breach of our internal policies and procedures, including our Code of Conduct.
- conduct likely to damage our brand, reputation or financial wellbeing.
- concerns that anyone is advising customers about furniture or optional services incorrectly, including deliberately misleading customers or not providing full explanations.
- unauthorised disclosure of confidential information.
- negligence.
- the deliberate concealment of any of the above matters.

Deliberately raising false malicious or vexatious 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.

5. How do I report?

You are encouraged to report any suspected wrongdoing or concerns at the earliest opportunity. There are several ways you can do this, depending on what feels most appropriate or comfortable for you:

- (1) In most cases, concerns should be raised directly with your line manager, either verbally or in writing. Line managers are often the best person to address issues promptly or escalate them where appropriate.
- (2) Concerns can be reported directly to the Whistleblowing Team via the Whistleblowing Mailbox using whistleblowing@dfs.co.uk.
- (3) Employees, contractors, visitors, and suppliers can submit concerns anonymously through the Google Whistleblowing Disclosure Form.
- (4) You can report anonymously through our dedicated whistleblowing hot line, provided by Health Assured. Tel: 0800 047 4037
- (5) You can escalate your concern to the Whistleblowing Officer (Group Head of Internal Audit), the Chief Group Legal and Assurance Officer or any Non-Executive Director.

All contact details are provided in section 12.

6. Can I remain anonymous?

Everyone should feel safe and supported in speaking up, with the confidence that raising a genuine concern will never lead to negative consequences. We genuinely want all colleagues to feel comfortable voicing concerns openly, but we also understand that this isn't always easy.

If you want to raise a concern anonymously that choice will be respected. Your identity will not be disclosed unless we are legally required to do so and if that situation arises, we'll work with you sensitively to decide on the best way forward.

You should, however, be aware that remaining anonymous may limit our ability to investigate the matter fully.

Whatever path you choose, please know we're here to listen and help. Your voice matters.

The company also recognises our duty of care to employees against whom a complaint has been lodged, and that false allegations can be very damaging to individuals. We will support those colleagues through the process; they will be treated as innocent and no action taken until a full investigation has been completed.

7. What happens next?

Once you have raised a concern, preliminary enquiries will be made to determine if further investigation is needed.

Where the reported matter is within scope of this policy and requires further investigation, we will appoint an investigation officer with the relevant expertise, which may be from a third party. The company reserves the right to appoint external lawyers to carry out investigations.

If you have identified yourself, we will arrange a meeting as soon as possible to discuss your concern. You may bring a colleague to the meeting and if you choose to do so, you and your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will record a written summary of your concern and aim to provide you with an outline of how we propose to address the matter.

While specific details and the outcome of the investigation will remain confidential, you will be kept informed about any action taken. Additional meetings may be requested to gather further information.

8. If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts outlined in section 12. They will:

- Review: Perform a review of the original assessment, actions taken, and any communications, to ensure they align with the policy and process has been followed.
- Provide feedback: The outcome of this review and any actions arising should be communicated to the person raising the concern.

9. External disclosures

This policy provides an internal process for reporting, investigating, and addressing workplace issues, so external reporting is usually unnecessary. However, 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. It will very rarely, if ever, be appropriate to alert the media. We strongly advise seeking guidance before contacting anyone outside the organisation.

If you want any further advice, you can contact an independent whistleblowing charity, Protect, which operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

While whistleblowing typically involves reporting internal matters, for example a colleagues' conduct, it can also concern third parties such as customers or suppliers. In some cases, the law protects reporting directly to these parties. Nonetheless, we encourage reporting concerns internally first, either to the named contacts in this policy or via the whistleblowing hotline. Contact details can be found in section 12.

10. Protection and support

We understand that whistleblowers may worry about possible repercussions. We are committed to supporting colleagues who raise genuine concerns, even if they are later found to be mistaken.

You will not face detrimental treatment for raising a concern. If you believe you have been treated unfairly, inform your line manager—or your People Business Partner if more appropriate. If unresolved, you may raise the issue formally through our Grievance Procedure.

Threatening or retaliating against a whistleblower is strictly prohibited and may result in disciplinary action, including dismissal. In serious cases, individuals exhibiting this behaviour could also face personal legal liability in an Employment Tribunal.

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.

11. Governance

The Board holds overall responsibility for this policy and reviews the effectiveness of actions taken. The People Team manages day-to-day operations and ensures relevant training for managers and colleagues involved in handling concerns or investigations. However, all colleagues share responsibility for the policy's success and are encouraged to report any suspected wrongdoing.

This policy has been approved by the Board of Directors' of DFS Furniture PLC. It does not form part of any employee's contract of employment, and we may amend it at any time. Comments or questions about this policy should be directed to the Chief Legal & Assurance Officer.

12. Contacts

12. Contacts	
Whistleblowing hotline (Health Assured)	Tel: 0800 047 4037
Internal Whistleblowing Email	whistleblowing@dfs.co.uk
Whistleblowing Disclosure Form	<u>Disclosure Form</u>
Protect (Independent whistleblowing charity formerly known as Public Concern at Work)	Helpline: (020) 3117 2520 E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk
Whistleblowing Officer: DFS Group Support Centre 1 Rockingham Way Redhouse Interchange Adwick-le-Street Doncaster DN6 7NA	Stephen Lock, Group Head of Internal Audit Email: Stephen.lock@dfs.co.uk Phone: 07596 868337
Whistleblowing Team	Stephen Lock, Group Head of Internal Audit Email: Stephen.lock@dfs.co.uk Richard Shackleton, Head of Shared Services Email: richard.shackleton@dfs.co.uk Hayley Thurlow, ER Manager Email: hayley.thurlow@dfs.co.uk
Chief Legal & Assurance Officer	Liz McDonald Email: liz.mcdonald@dfs.co.uk Tel: 07849083971