

## Key information

1. **Policy owner** – Bruno Silveira, Group Head of Compliance
2. **Policy status** – **mandatory** for all Kingfisher Colleagues.
3. **Policy adopted** – by Group Head of Compliance
4. **Policy validation** – by Group Ethics and Compliance Committee on 02 November 2021
5. **Policy questions** – Bruno Silveira/ Legal & Compliance/ [bruno.silveira@kingfisher.com](mailto:bruno.silveira@kingfisher.com)

## Policy vision

At Kingfisher, we are committed to maintaining an open culture with the highest standards of honesty and accountability, where Colleagues and Third Parties can report legitimate concerns in confidence, and we welcome the voicing of genuine and serious concerns about actual or alleged malpractice and wrongdoing.

This Policy seeks to: (i) ensure all individuals feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical, illegal or inappropriate conduct; (ii) encourage all improper, unethical, illegal or inappropriate behaviour to be identified and challenged at all levels of the organisation; (iii) provide clear procedures for reporting and handling such concerns; (iv) provide assurance that such disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and (v) help promote and develop a culture of openness, accountability and integrity.

Definitions of *italicised* words are set out in the Definitions section later in this Policy.

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## The policy

1. This Policy applies to all Kingfisher Colleagues and Third-Parties and sets out the key processes for any individual to report perceived improper, unethical, illegal or inappropriate conduct of Kingfisher Colleagues and Third Parties in a confidential manner without fear of harassment, retaliation, intimidation, victimisation or reprisal.
2. Kingfisher Colleagues and Third Parties are expected to report any actual or suspected breaches of the law, Group Policies and Standards.
3. We will provide a process for Kingfisher Colleagues and Third Parties to raise their concerns securely and without fear of recrimination, knowing that their confidentiality will be respected and that matters of concern are promptly investigated and resolved where possible.
4. Colleagues can speak directly to their line manager or a senior manager, the HR team, Group Head of Compliance or to the Legal and Compliance team. Third Parties have the option of reporting their concerns to the Group Head of Compliance ([codeofconduct@kingfisher.com](mailto:codeofconduct@kingfisher.com)), the Kingfisher Legal and Compliance team or to the Third-Party's contact in the Kingfisher Procurement team.
5. Where Colleagues have genuine concerns, and feel they want to remain anonymous, they must have free access to an independent confidential mechanism for reporting such concerns and we will provide this.
6. We will ensure that no individual will be disciplined or suffer any retaliation or recrimination for raising a legitimate concern under this procedure, even if it proves to be mistaken. However, any Colleague whose disclosure was not made in good faith and is found to be deliberately false or made with malicious intent will be subject to disciplinary procedures. Also, a Third Party whose disclosure is not made in good faith and is found to be deliberately false or made with malicious intent may risk termination of the business relationship with Kingfisher.

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7. All incidents reported in good faith will be reviewed and/or investigated and all actions recorded. Feedback on progress or the result of disclosures will be provided to the individual as necessary in line with how the report was made.
8. Each Kingfisher Entity will communicate and publicise the whistleblowing facility appropriately and ensure the service is freely available to all its Colleagues and Third Parties, during and outside of working hours. Whistleblowing facilities will be tailored to the local conditions in each jurisdiction where the Kingfisher Entity operates. The Local CEO or Head of Function has overall responsibility for the appropriate implementation and communication of the whistleblowing facility in the relevant Entity, with support and oversight from the relevant Local Compliance Officer and Local Ethics and Compliance Committee.
9. SpeakUp reports targeting members of the Group Executive shall be brought to the attention of the Chair of the Board.

## The process

### Types of concerns

All Colleagues and Third Parties are expected to raise concerns about any actual or perceived wrongdoing within Kingfisher. This could include (but is not limited to):

- commission or suspicion of commission of a criminal offence;
- failure to comply with legal or regulatory obligations;
- threat or serious damage to the public interest (e.g. illicit activities that might need to be formally notified to public authorities);
- a breach of the Group's Code of Conduct or other Group policies; and
- deliberate concealment of any of the above.

### Reporting

There are a number of ways to report a concern:

- If you are a Colleague, you may seek guidance or report a concern by speaking to your Line Manager or a senior manager, to your HR team, to the Group Head of Compliance or to your Legal and Compliance team, as long as you feel comfortable doing so. This makes

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it easier to collect the necessary information and maintain a dialogue regarding the disclosure going forward.

If you do not feel comfortable to raise your concern in person:

- Anybody can seek guidance or report a concern via [codeofconduct@kingfisher.com](mailto:codeofconduct@kingfisher.com).
- You also have the option of using Kingfisher's independent SpeakUp channel, via telephone or our web-based facility, where Colleagues and Third Parties can raise concerns (<http://kingfisher.ethicspoint.com/>).

The available telephone numbers are:

Country	Hotline Number
Brazil	0800 000 0062
China	400 120 0210
France	0 800 91 89 06
Germany	0800 1819681
Hong Kong	800 901 421
India	000 800 9191 215
Ireland	1800 85 16 80
Poland	800 005 034
Portugal	800 180 769
Romania	0800 890 349
Russia	8 (800) 301-45-85
Spain	900 999 446
Turkey	0800 621 2361
United Kingdom	0800 949 6481
Vietnam	(833) 373-1008

Individuals reporting a concern can be assured that their concern will be taken seriously, that it will be considered promptly, appropriate investigatory steps taken and that they will have access to updates and reports on actions taken, if appropriate.

No individual will be subject to retaliation for any report of suspected misconduct that is made in good faith, even if it later turns out to be mistaken or incorrect.

## SpeakUp

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SpeakUp is a service operated by the Group's external whistleblowing service provider, NAVEX Global. They provide a free, confidential, and secure facility for individuals to report concerns online, or to trained operators by telephone, or to leave a message via an automated messaging system in the caller's own language. Information regarding access to SpeakUp will be made available to all individuals at all Kingfisher locations. The Kingfisher Procurement and Sourcing teams are responsible for raising awareness around the Speak Up channel to Third Parties as appropriate.

### Information Exchange

When reporting a concern, individuals are asked to provide as much relevant information as possible to enable the concern to be assessed and investigated. This may include information such as:

- The nature of the alleged misconduct and when and where it occurred
- The names, job function and contact details of any people involved
- The contact information of the individual making the report (should one wish to provide it) and whether or not they are employed by Kingfisher
- Any documents or supporting information that can be used to validate the report

This information can be provided through any of our whistleblowing channels, including in-person, by email, or through the SpeakUp system.

Once a report is submitted via the SpeakUp channel, an acknowledgment of receipt will be delivered to the whistleblower within seven days.

After an initial review, a decision will be made as to whether and how Kingfisher will investigate the report. Once a decision was made to pursue an investigation, Kingfisher will endeavour to notify the individual making the report within a period of 3 months. The timeframe of investigations may vary according to the complexity of the case.

All related parties will be notified once a case is closed. However, we may not be able to provide full details of the outcome of a case for reasons of confidentiality, privacy, and the legal rights of all concerned.

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## Confidentiality

Information received through Kingfisher’s whistleblowing channels will be treated confidentially. The identity of an individual raising a concern and the information provided will be shared on a “need-to-know” basis with those responsible for investigating or resolving the concern, and the identity of the person targeted by the concern shared only once the validity of the concern has been established.

Any deliberate breach of confidentiality as part of the Kingfisher whistleblowing process could give rise to disciplinary sanctions.

The only exception is if the information must be disclosed due to legal requirements. If legal authorities so require, Kingfisher may share the identity of both the whistleblower, and the person targeted by the concern without consent.

## Proven Violations

Proven violations of provisions of the law, as well as Group Policies, may lead to severe disciplinary actions taken against the offending Kingfisher Colleague or Third-Party. Such action could involve:

- (a) a formal reprimand
- (b) suspension
- (c) legal proceedings; and/or
- (d) termination of employment or Third-Party contracts.

## Roles and Responsibilities

- Whistleblower – Whistleblowers are expected to act in good faith and only provide information of which they have first-hand knowledge. Where possible they should be prepared to provide further evidence or information (including when making an anonymous report) in order to aid any investigation. Knowingly providing false or misleading information will not be tolerated and may lead to sanctions or prosecution. Should a whistleblower feel that an issue they have raised has not been adequately addressed, they can refer this to the Group Head of Compliance directly or through the SpeakUp service.

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- SpeakUp – The SpeakUp service will accurately record and categorise the information received from the whistleblower. It will promptly provide SpeakUp Champions of the relevant Kingfisher Entities with a transcript of the report to allow for consideration of the concern raised. Sensitive Matters will be sent to the Group Head of Compliance. Should it be necessary, the SpeakUp service will liaise between the caller and the investigation team to obtain more information and to provide updates to the whistleblower.
- SpeakUp Champions – SpeakUp Champions are responsible for the assessment, investigation and management of all whistleblowing cases received into the Kingfisher Entity from SpeakUp or any other channel, with the exception of Sensitive Matters which are referred to the Group Head of Compliance. The SpeakUp Champion is responsible for entering into the Speak Up channel any new reports that are received from outside the SpeakUp channel. Cases deemed to be sensitive, or which are raised by Third Parties will be referred to the Group Head of Compliance. The SpeakUp Champion will be responsible for ensuring that investigation reports are entered into the SpeakUp system as well as reporting on progress to the whistleblower, where appropriate.
- Investigator - All incidents reported via Kingfisher's whistleblowing channels will be considered promptly, professionally, confidentially, independently and in an unbiased manner by trained individuals identified within each Kingfisher Entity. Where an investigation is undertaken, it will be conducted in accordance with the Kingfisher Investigations Protocol and all actions will be recorded on the SpeakUp Case Reporting System.
- Group Head of Compliance – The Group Head of Compliance is responsible for ensuring that the SpeakUp service provided by NAVEX Global is available to all Kingfisher Colleagues and Third Parties in all locations and where possible in the local language. This will include ensuring that information and training is provided on a regular basis. The Group Head of Compliance is also responsible for managing investigations into Sensitive Matters, conducting regular reviews on the Whistleblowing process and performance, and reporting regularly to the Group Ethics and Compliance Committee, the Audit Committee, and the Board. The Group Head of Compliance may escalate to the Kingfisher CEO/CFO, whenever necessary, any Sensitive Matters which may result in a significant risk exposure for Kingfisher. To ensure issues are properly investigated, a sample of issues will be selected each quarter and the investigation file will be reviewed by the Group Head of Compliance, in accordance with the Whistleblowing Internal Investigation Protocol.

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- Local Compliance Officer - The Local Compliance Officer will support the local CEO/ Head of Function with the implementation of the whistleblowing facility and will report SpeakUp cases regularly to the Local Ethics and Compliance Committee, the Local Audit Committee, and the Local Board. The list of Local Compliance Officers is available [here](#).

### Protection of whistleblowers

Kingfisher will not tolerate harassment, retaliation, intimidation, victimisation or reprisal against whistleblowers. In some countries the law provides specific protection to individuals who raise concerns, in which case such stricter legal protections will prevail.

The information provided by the discloser will be appropriately protected both by the Group and where applicable, the independent whistleblowing service provider, against unlawful destruction, alteration, access or disclosure.

Should an individual believe that they are being subjected to detriment as a result of raising a concern, they should escalate this to the Group Head of Compliance, the Group Director of Audit and Risk, or the Chief People Office, either directly or through the SpeakUp service.

### Anonymous Reporting

Kingfisher encourages individuals who disclose concerns to identify themselves wherever possible as it allows for more efficient follow up between the Group and the discloser of the concern and supports an open culture where Colleagues feel empowered and confident to speak up.

However, in those countries where anonymous disclosures are permitted by law, concerns can, if preferred, be raised anonymously via telephone or through the SpeakUp service. Such concerns will be treated with the same care and consideration as all other concerns.

Even in the case of anonymous reports, it is important that communication channels remain open between the Kingfisher Entity and whistleblowers to allow the Kingfisher Entity to provide updates on the disclosure and to facilitate the exchange of further information and documentation that may be required. When you file a report through the SpeakUp service you receive a unique username and are asked to choose a password. You can subsequently return

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to the SpeakUp system again either by Internet or telephone and access the original report to anonymously add more detail/information or answer questions posed by a SpeakUp Champion.

### **Communication and Training**

The HR teams in each Kingfisher Entity will ensure that Kingfisher Colleagues receive training on the Code of Conduct and the facility to report any concerns they may have. The HR team is also responsible for ensuring that information regarding the SpeakUp service is made available to all staff in local language using posters provided to them, and that it is presented immediately to new hires in all parts of the Group.

### **Protection of Personal Data**

Kingfisher is committed to protecting your privacy. We collect and process personal information provided in connection with the Whistleblowing system in accordance with all applicable laws and regulations that relate to data protection and privacy, including the UK and EU General Data Protection Regulation (GDPR), as applicable. Your personal data will only be retained for as long as there is a need for it, and when there is no longer a need for retaining the registered information, it will be anonymised or deleted as required.

For more information on your rights in relation to the personal data we hold, please refer to the Privacy Notice for the Kingfisher SpeakUp Channel, the Employee Privacy Notice, and Kingfisher's Record Keeping and Document Retention Standard.

## **Bringing our policies to life**

We all have a part to play in implementing this Policy and upholding Kingfisher's commitment to conduct the Group's business in a responsible and transparent manner.

Everyone within the Kingfisher Group is required to comply with this Policy.

You should be aware that breaches of this policy may result in an investigation that could lead to disciplinary action, up to and including dismissal. Depending on the circumstances, such breaches may also constitute a civil and/or criminal offence.

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## Support and questions

If you have any questions about this Policy, or if you are uncertain how to apply or follow the process you can email [codeofconduct@kingfisher.com](mailto:codeofconduct@kingfisher.com).

## Definitions

For the purposes of this Policy:

"**Kingfisher Colleagues**" or "**Colleagues**" means all persons working for a Kingfisher Entity or on its behalf in any capacity, including employees at all levels, directors, officers, contractors, agency workers, seconded workers, volunteers, and interns.

"**Kingfisher Entity**" or "**Entity**" means all companies that are part of the Kingfisher Group, including Banners and Group Functions.

"**Sensitive Matters**" are those potentially involving one or more of the following characteristics:

- (a) senior management or senior executives;
- (b) a potential financial impact of over £25,000;
- (c) competition law breaches;
- (d) tax evasion allegations;
- (e) bribery or corruption; or
- (f) contractors, suppliers, agents or other Third-Parties;
- (g) a potential or actual significant adverse impact on Kingfisher's reputation;

"**SpeakUp Champions**" means Kingfisher Colleagues internally authorised to manage investigation activities within Kingfisher Entities, such as Banner HR representatives or local compliance officers.

"**Third Party**" means all suppliers, vendors, service providers, intermediaries, agents, business partners, external consultants, charities, advisors or entities contracted or proposed to be contracted or engaged by Kingfisher.

## Related documents

- [Code of Conduct](#)
- [Privacy Notice for the Kingfisher SpeakUp Channel](#)
- Sanctions Policy

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