WHSmith Whistleblowing Policy

Updated November 2025

This policy applies to all WHSmith colleagues across Stores and Support Centres.

Accessibility Statement - This policy can be requested in alternative formats by contacting DEIB@WHSmith.co.uk or your line manager.

1. Purpose

At WHSmith, we are committed to fostering a culture of openness, integrity and honesty. We encourage people to speak up about concerns. Whistleblowing plays a vital role in maintaining our ethical standards as well as ensuring that we are doing business in accordance with legal requirements.

This policy sets out how individuals can raise concerns confidentially and safely, the protections and support available to those who do so and the procedures we follow to investigate and respond to disclosures.

Individuals who raise concerns in good faith are protected also by the law.

2. Policy

Our Policy is to actively promote a culture where individuals feel safe and supported to raise concerns without fear of retaliation or detriment.

Everyone has a responsibility to report suspected wrongdoing as soon as possible.

This policy is designed for raising concerns about wrongdoing when they relate to issues such as criminal offences, breaches of legal obligations, health and safety risks, environmental damage, or the deliberate concealment of any of these.

This policy is not designed for raising personal grievances/ complaints, such as disputes about working hours, performance reviews, interpersonal conflicts, or dissatisfaction with management decisions. These types of issues should be addressed through our grievance/ complaints procedure which is detailed in the grievance/ complaints policy.

3. Scope

This policy applies to all who work on behalf of WHSmith, including employees, contractors, agency workers, consultants, trade union representatives acting in their official capacity, non-executive directors, trustees and office holders. The Policy covers all businesses in the WHSmith Group.

In line with local regulations, there may be additional individual country requirements.

Please refer to individual country policies or contact your relevant People Partner/team for guidance.

4. Reporting Channels

If you have a concern but feel unable to speak directly to the person involved, you are encouraged to raise the matter with your line manager in the first instance. If that is not possible or appropriate you may report your concern through any of the following channels:

- A member of the Legal, HR or Group Risk teams
- A member of your business unit's leadership team
- A member of the Group Executive team
- Safecall, our independent and confidential whistleblowing service, available 24/7. Safecall allows you to report concerns anonymously if you wish and ensures that your disclosure is handled securely and impartially.

Online: www.safecall.co.uk/report

5. Investigation of concerns

WHSmith commits to taking reasonable steps to investigate whistleblowing disclosures. This includes:

- Promptly acknowledging receipt of the concern.
- Assigning an impartial investigator with appropriate training.
- Conducting a timely and fair investigation in line with internal standards.
- Providing updates to the whistleblower at key stages.
- Documenting findings and actions taken.
- Ensuring confidentiality throughout the process.

6. Protection from Retaliation

WHSmith is committed to ensuring that anyone who raises a concern in good faith is treated with respect and protected from any form of retaliation. We will not tolerate any adverse treatment such as dismissal, demotion, harassment, victimisation or loss of opportunity as a result of raising a concern or speaking up.

Our aim is to foster a culture where people feel safe and supported to raise concerns without fear of retaliation. If you believe you are experiencing retaliation as a result of raising a concern you are encouraged to report it immediately through any of the reporting channels outlined in this policy.

All allegations of retaliation will be taken seriously and investigated in line with our disciplinary procedures, which may result in appropriate action, up to and including dismissal/ termination.

Malicious or knowingly false reports may result in disciplinary action.

7. Confidentiality and Anonymity

Your identity will be protected as far as possible. Any personal data provided when making a whistleblowing report will be handled in line with applicable data protection legislation.

Anonymous disclosures are accepted but may limit investigation effectiveness.

Policy Compliance

Owner:	Legal
Last Updated:	November 2025
Next Review:	November 2026