

Purepay Retail Limited
Trading as The Edinburgh Woollen Mill, Ponden Home and
Bonmarche

Whistleblowing Policy and procedure

February 2024

“The Company” means Purepay Retail Limited, company number 11741716 with registered address at One St Peter’s Square, Manchester, UK, M2 3DE and subsidiary and associate companies.

1. Policy Aims

All Company employees are encouraged to raise genuine concerns relating to how our businesses operate and how our employees conduct themselves. It is our intention to fully investigate concerns raised in relation to any malpractice within the businesses of the Company. This policy is designed to assist employees in raising matters of concern in an appropriate manner and to have the confidence that matters raised will be reviewed at the highest level without undue delay and without fear of retribution.

It is important that, any criminal behaviour or other wrongdoing by an employee, or any individual undertaking work with the Company, is reported and properly dealt with.

This Whistleblowing policy is underpinned by the Public Interest Disclosure Act 1998 (known as the Whistleblowers Act). This gives legal protection to employees against being dismissed or penalised by their employers, as a result of publicly disclosing certain serious acts or omissions.

It is not a forum for personal complaints or Grievances.

Personal grievances cannot be dealt with under this policy.

2. What Kinds of Impropriety?

- Financial malpractice, impropriety or fraud.
- Corruption, bribery, unethical behaviour, improper conduct or blackmail (also see Anti Bribery Policy).
- Criminal offences.
- Failure to comply with legal or regulatory obligations.
- Miscarriage of justice.
- Endangering health & safety (also see Health & Safety Policy)
- Endangering any element of the environment.
- Concealment of any of the above.

3. What the Whistleblowing Policy does not deal with –

- Complaints of a personal nature relating to the complaining employee.

The Company has comprehensive Grievance procedures in line with statutory requirements which should be used for matters of this kind. In the first instance, contact your line manager or the HR Department.

4. How will a report be dealt with?

- All concerns raised will be treated fairly and properly.
- The harassment or victimisation of anyone raising a genuine complaint will not be tolerated.
- An individual making a disclosure will retain anonymity so long as this does not hinder the investigation or they agree otherwise. For instance, it may be necessary for the individual to give a witness statement or the scope of the investigation may, unavoidably, reveal the source of the disclosure.
- The complainant will be advised who is dealing with the complaint.
- No one will be at risk of suffering any form of retribution with regard to the raising of the complaint, even if they are mistaken.

However, this assurance cannot be given where it is found that the complaint is being made maliciously or where the matter is known by the complainant to be untrue.

5. How to make a Whistleblowing report: -

Report issues of concern, this may be orally or in writing to the Company Secretary;

Contact details:

June Carruthers
Purepay Retail Limited
Global House
5 Castle Street
Carlisle
CA3 8SY

Mobile: 07900 575056

Office: 01228 210830

Email: june.carruthers@ewm.co.uk

Please note that it is unlikely to be appropriate to carry out an investigation based on allegations provided anonymously.

It is also expected that you will be able to provide some reasonable evidence of your allegation to allow an investigation to proceed.

The Board shall be informed of any complaint and the Board shall decide on the appropriate investigation procedure and any required further action to be taken.

6. Policy Review

To ensure that the policy remains appropriate, up to date and effective it shall be reviewed by the Board at least annually and after any significant structural or legal change.

On behalf of the Board of Directors of Purepay Retail Limited



John Jackson
Group Finance Director, 21.02.2024