

Speak Out Policy

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1. Introduction

1.1. Speak Out

At Bettys & Taylors Group, we take a responsible approach to business, guided by our Six Ps. We work hard to ensure our business practices meet with legal requirements and provide a safe working environment for all our stakeholders.

Notwithstanding this, you may have concerns about what is happening at work or observe conduct that appears to breach the law, our values, policies or procedures. If you observe or suspect misconduct or inappropriate behaviour, you are encouraged to Speak Out. By doing so, you give us the opportunity to deal with the issue.

We take any allegations of wrongdoing very seriously and encourage people to Speak Out if they have an issue. Employees who Speak Out are protected and will not suffer for raising concerns in good faith. We do not tolerate any form of retaliation, after all, Speaking Out is essential to sustain our reputation, success and ability to operate, both now and in the future.

1.2. Purpose of the Speak Out policy

This policy explains how you can raise concerns in confidence and what you can expect from us if you do Speak Out.

1.3 Who can Speak Out?

This policy is available to everyone working for and on behalf of Bettys & Taylors Group. This includes any party with whom we have a business relationship, including suppliers and business partners and the Shareholders.

1.4 What is covered by this Speak Out policy?

This policy can be used to raise concerns that appear to breach the law, our values, policies or procedures (by the company, employees, a customer or any third party working with the business).

Examples of concerns that can be raised using this policy include, but are not limited to:

- any behaviour linked to an abuse of power, position or authority which constitutes, encourages or supports inappropriate behavior;
- fraud;
- discrimination or harassment;
- criminal offences;
- violation of competition laws and rules;
- inadequate financial or non-financial record keeping or tax evasion;
- conflicts of interest;
- bribery;
- environmental, health and safety issues;
- improper behavior, including but not limited to the use of drugs or alcohol;
- improper use of company resources;

- disclosure of confidential information;
- breach of Bettys & Taylors Group policy on gifts and hospitality;
- practices that may impact the safety, authenticity, quality and legality of our products; and
- covering up any of the above

Speak Out issues are those which could have a wider impact on public interest; matters relating to you individually should be dealt with through informal discussion or, failing that, by raising a grievance. Examples of each are set out below;

Speak Out Issues: <i>on wider public interest</i>	Grievance: <i>a matter of personal interest</i>
<i>A disclosure regarding:</i>	<i>An individual's concern regarding:</i>
A request to carry out tasks genuinely believed to be illegal e.g. falsifying expense claims	Rejection of their expenses claim
Short cuts a team has been asked to take to meet production targets, which endanger safety	Insufficient Health and safety training
Requirements imposed by the business upon a group of employees, in breach of Working Time Regulations	The hours s/he is expected to work
How the business disposes of its contaminated waste, in breach of environmental health laws	The amount of paper used in the department and makes this complaint to their manager
Persistent bullying ,of an individual or team, , which, although reported, consistently fails to be addressed	Another's treatment of you in the workplace that makes you feel uncomfortable
Recruitment practices which directly disadvantage disabled people applying for roles, breaching the Equality Act	An unsuccessful application for a new role
Use of sexist, racist or ageist language (not necessarily directed at you)	A comment made to you that you feel was inappropriate

You should only use the Speak Out policy if you genuinely believe the disclosure you are making is in the interests of the wider business, or the public interest. This policy is not to be used for individual grievances relating to your terms of employment, settling personal disputes or making accusations you know to be false, doing so may lead to disciplinary action. These individual complaints should be handled through the HR Grievance procedure.

For further guidance on the giving and receiving of gifts and hospitality, please refer to the Anti-Bribery and Corruption Policy and the Gifts and Hospitality Procedure in the Company Secretariat section on the Governance site.

2. How to Speak Out?

This policy does not replace your usual reporting lines. If you have a concern that you would like to report, we hope you feel able to raise it first with your line manager, in person or in writing. However, we understand you may find it difficult to speak out using the internal channel. If you feel unable to raise the matter with your manager, please contact the Speak Out Officers via speakout@bettysandtaylor.co.uk (the Assistant Company Secretary, Head of Risk and Central Services HR Director); a member of the CCEO or the Chair of the Audit & Risk Committee or by letter addressed to the Company Secretariat, Bettys and Taylors Group Limited, 1 Parliament Street, Harrogate, HG1 2QU.

Any disclosures made are treated confidentially. The identity of the discloser, as far as is possible, will be kept confidential, although no absolute promise of confidentiality can be made.

Members of the Family working in the business should follow this same process. Other Family members should inform the Chair of the Family Council.

2.1. Speaking Out externally

We strongly encourage you to raise concerns internally through one of our available channels. Taking a concern to an outside party, such as the media, could have serious implications for Bettys & Taylors Group, for the persons involved and, possibly you. By speaking out internally, you give us the chance to investigate the matter, protect your anonymity and take action, if appropriate.

2.2. What information is needed?

When raising a concern (in person or by email) please provide as much information as you have, to enable us to assess and investigate your concern. This could include:

- the background, history and reason for the concern;
- names, dates, places and other relevant information; and/or
- any documents that may support your disclosure.

We encourage you to Speak Out as soon as possible, before situations get out of hand or damage is done. It is always better to discuss upfront than report afterwards, so Speak Out with the facts available to you. You are not expected to prove that your concern is well founded. We will investigate to determine if there is reason for concern.

2.3. Safeguarding your position: confidentiality and non-retaliation

All reporting is confidential. Your concern will only be shared with a limited number of people on a strict 'need to know' basis. Information will only be disclosed beyond this small group if we are required to do so by law or an important public interest is at stake. You can also help protect this confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

You can Speak Out about your concerns anonymously, but we encourage you to share your identity as it is more difficult to investigate anonymous disclosures.

We are committed to protecting the privacy of all persons involved. We will do all that is reasonably possible to safeguard personal data from unauthorised access or processing. Any personal data obtained as part of the Speak Out policy will only be used for the purposes explained in this policy, to comply with the law or an important public interest.

We encourage you to Speak Out and those who do are protected. Please feel confident that you will not suffer for raising concerns, in good faith, about suspected misconduct. Any form of threat or retaliation will not be tolerated. Retaliation is a disciplinary matter.

However, you will not be protected if you maliciously raise a concern you know is false. Knowingly making a false accusation, lying to investigators, interfering with an investigation or refusing to cooperate in an investigation may lead to disciplinary action against you.

2.4. What happens after you Speak Out?

We take every report of possible misconduct seriously. Your report will be reviewed and where appropriate, investigated.

Never investigate the matter yourself and do not seek evidence to build a stronger case. No disciplinary or other measures will be taken against you if your genuine concern later turns out to be mistaken or misplaced.

You will be informed of the overall findings, however, for reasons of confidentiality, privacy and the legal rights of all concerned, we will not be able to provide full details of the outcome or related actions taken. All parties involved are entitled to confidentiality to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

2.5. Independent advice

If you are unsure whether to use this policy or you want independent advice, you may contact the independent charity Protect on 020 3117 2520. Their advisers can talk you through your concerns and options available.

2.6. Protection against detrimental treatment

If you feel you are being subjected to detrimental treatment because you chose to Speak Out, you should speak to a member of the HR team. Any such reports will be treated seriously and could result in potential disciplinary action against individual colleagues. If you have any questions about this policy, please contact a member of the Company Secretariat team.

3. Document owner and approval

The Company Secretary is the owner of this document and is responsible for ensuring that the policy is reviewed in line with all legal requirements, together with emerging best practice. A current version of this document is available to all employees on the Bettys & Taylors Group Governance site. It is also available on the Group's website. It does not contain confidential information and can be released to relevant external parties.

Version Control

Version	Date change(s) made	Change(s) made by	Summary of change(s)
V1.01	2018-05-30	Co Sec	Additional bullet point added to section 4 – ‘What is Whistleblowing’
V1.02	2018-12-17	Co Sec	As above
V2.0	2019-05-24	Co Sec	Updating the policy; primarily to change terminology
V2.01	2019-10-10	Co-Sec	After A&R, update punctuation and grammar
V2.02	2020-10-23	n/a	Approved by Board via email
V2.03	2021-07-07	Co Sec	Updated the speak out email address and included the head office address under section 2. Version control table moved to end of document.
V2.04	2022-01-17	Co Sec	Updated review date
V2.05	2022-09-02	Co Sec	‘authenticity’ rather than ‘integrity’ at the top of page 4
V2.05	2023-05-01	Co Sec	Review - no changes required