



WATCHES OF SWITZERLAND GROUP PLC

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# WHISTLEBLOWING POLICY (THE “POLICY”)



# WHISTLEBLOWING POLICY (THE “POLICY”): WATCHES OF SWITZERLAND GROUP PLC

It is important to the business to have an open and transparent work culture. We aim to conduct our business with the highest standards of honesty and integrity every day. We take protecting our colleagues, suppliers and stakeholders seriously. However, like any organisation, there are occasions where we face the risk of things going wrong, or we are unaware of wrongdoing, such as dangerous, fraudulent, illegal or unethical conduct taking place.

## THE PURPOSE AND SCOPE OF THE POLICY

The Policy is in place to encourage you to report genuine incidents of suspected wrongdoing as soon as possible. Your concerns will be taken seriously, investigated as appropriate and wherever possible you will be informed of the outcome.

The Policy covers all employees, officers, consultants, contractors, casual workers and agency workers. Any third parties working on behalf of Watches of Switzerland Group PLC (the “Group”) may also make use of the Policy. Personal grievances and complaints are not covered by this Policy. They are covered by the Group’s Grievance Policy.

The Policy is for guidance only and does not form part of your contract of employment.

## WHAT IS WHISTLEBLOWING?

Under the Public Interest Disclosure Act 1998 (as amended by the Employment Rights Act 1996), protection is provided for workers who disclose legitimate concerns about suspected wrongdoing, misconduct or malpractice connected to the company they work for. This means that they cannot be victimised, harassed or have their employment opportunities curtailed as a direct consequence of making a whistleblowing disclosure. Not all disclosures are considered ‘whistleblowing disclosures’ so it is helpful to think “is the wrongdoing in question likely to be in the ‘public interest?’”.

Whistleblowing disclosures are not to be confused with raising a personal grievance such as one that would be dealt with under your employment contract.

The Public Interest Disclosure Act 1998 states that matters could include, but are not limited to:

- criminal activity;
- a failure to comply with a legal or regulatory obligation;
- a miscarriage of justice;
- the endangering of an individual’s health and safety;
- damage to the environment;
- false accounting or reporting irregularities;
- deliberate concealment of information relating to any of the above.

In addition to the issues listed above, the Group considers that raising concerns about the following issues may constitute a public interest disclosure:

- suspected fraud or corruption
- sexual, physical or verbal abuse
- bullying or intimidation of employees, customers or service users
- serious failures to comply with the Group’s policies and procedures

If you are reporting a concern it is your responsibility to ensure that any report is made in good faith and that you have reason to believe that the claim is true. You are encouraged to provide as much information as possible. You do not need to provide your report in writing nor do you need to provide proof but you must have a reasonable belief that the wrongdoing is being, has been or is likely to be committed.

If misconduct is discovered as a result of any investigation under this procedure the Company’s disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.

### WHO IS RESPONSIBLE FOR THE POLICY?

The Group Board has overall responsibility for this policy, in line with the Corporate Governance Code 2018.

The Executive Director, Human Resources has day-to-day operational responsibility for the Policy and will ensure that all relevant managers and employees who may deal with concerns or investigations under this policy receive appropriate training.

### HOW TO RAISE A CONCERN

1. In the first instance, and unless you reasonably believe your line manager to be involved in the wrongdoing, any concerns should be raised with your line manager. If you believe your line manager to be involved, or for any reason you do not wish to approach your line manager, then you have further options as set out below.
2. If you are concerned that your line manager is involved in the wrongdoing; that they have failed to make a proper investigation; or that they have failed to report the outcome of the investigations to the Executive Director, Human Resources, you should inform the Executive Director, Human Resources who will arrange for another manager to carry out the investigation.
3. In most instances we hope that individuals would feel they can raise concerns with their line manager as set out in paragraph 1 above or the Executive Director, Human Resources as set out in paragraph 2 above. However, if they feel that this is not possible their concerns can be raised via an independent and external facility. This facility is managed by Safecall and reporting can be done by phone (if you are an employee) or online in multiple languages via Safecall's secure web reporting facility: <https://www.safecall.co.uk/report>.
4. Individuals can also write in confidence to the Watches of Switzerland Group PLC Company Secretary & General Counsel directly if they prefer.

### HOW WE DEAL WITH YOUR CONCERNS

1. If you have followed the line manager route then your line manager will arrange an investigation of the matter (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position).

The investigation may involve you and other individuals involved giving a statement and we will ask for your permission in writing to this. An investigation will be carried out in accordance with HR procedures. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained.

The investigating manager will report to the Executive Director, Human Resources, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If appropriate, disciplinary action will be carried out in accordance with Company procedure.

On conclusion of any investigation, we will always try to communicate back to you the outcome of the investigation, although due to data protection and other issues this might not always be possible. We will always tell you when an investigation has been completed. If no further action is to be taken, the reason for this will be explained wherever possible.

2. If concerns have been reported either via the phone or online to Safecall, a unique case number is generated which allows for confidential dialogue to take place between the parties (e.g. should there be any further questions to ask). This includes situations where the party wishes to remain anonymous. It also enables feedback to be provided (e.g. progress status).

All issues and concerns raised via this mechanism are reviewed by the Head of Internal Audit, who will either investigate or pass it onto the relevant individual or team within the business to investigate.

All concerns will be taken seriously, fully investigated (taking into consideration the need for independence and the need to avoid any conflicts of interest), and appropriate action taken. If it is discovered that a manager has been made aware of an allegation of wrongdoing under this policy, but has not taken the appropriate action in this respect, that manager may be subject to disciplinary proceedings pursuant to the Company's disciplinary policy.

All investigations conducted are reported to our Audit Committee, which is a committee of the Board of Watches of Switzerland Group PLC that deals with internal control and risk identification. We will report such investigations even where no wrongdoing has been found.

### HOW WE WILL PROTECT YOUR CONFIDENTIALITY

We respect your right to confidentiality around your report and will make every effort to limit the number of people to whom your identity and report are made known.

We understand that you may wish to make an anonymous report and depending on your location it may be possible for you to do so when raising an issue as set out in the “How to raise a concern” section above. However, we would encourage you not to do so in order that we can carry out a full investigation and can ask you additional questions if necessary. Anonymous reports can also be made in writing addressed to Robert Moorhead, Chair of the Audit Committee.

In providing your report, you agree and consent to any use of your personal data to allow us to carry out the correct and proper operation of this policy. This includes the use of any personal data in any confidentially or anonymously brought procedure under this policy. All personal data shall be used and processed in accordance with our Data Protection Policy and Privacy Notice.

### HOW WE WILL PROTECT WHISTLEBLOWERS

We take our obligations towards whistleblowers very seriously, and we can assure you that you will not suffer any detriment from making a genuine report. We will take steps to ensure that this principle is adhered to: if any colleague is found to have harassed, or otherwise unfavourably treated, a genuine whistleblower, they will be subject to proceedings in accordance with our Disciplinary Policy, which may result in their dismissal.

### THIRD PARTIES

Third parties are encouraged to report genuine suspicions about any wrongdoing, or malpractice within the Group or that impact the Group and can be assured that any information received will be treated seriously and confidentially.

Any concerns or complaints that relate to your own organisation's internal operations and practices should be dealt with through your own organisation's normal reporting channels, policies, or procedures.

You are invited to make your report to your Watches of Switzerland Group contact in the first instance using any of the methods outlined in the “How to raise a concern” section of this policy.

### OTHER AVENUES OF SUPPORT

Remember, if you have a grievance relating to your employment there are relevant HR processes to follow as found in the Employee Handbook and in the Group's Grievance Procedure.

If on conclusion of an investigation you reasonably believe that the appropriate action has not been taken, legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- the Financial Services Authority;
- the Office of Fair Trading;
- the Health and Safety Executive;
- the Environment Agency;
- the Director of Public Prosecutions; and
- the Serious Fraud Office.

If you would like more general guidance on Whistleblowing the independent whistleblowing charity, Protect, operates a confidential helpline (see contact details below).

**Ian Carter**  
Chair

Approved by the Board of Watches of Switzerland Group PLC on 5 July 2022

## USEFUL CONTACT DETAILS

### WATCHES OF SWITZERLAND GROUP

Nikki Zamblera Executive Director, Human Resources	+44 (0)7775 661730	n.zamblera@thewosgroup.com
Mark Haworth (UK) Senior Legal Counsel	+44 (0)116 281 7261	m.haworth@thewosgroup.com
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Robert Moorhead Chair of the Audit Committee	Watches of Switzerland Group PLC Aurum House, 2 Elland Road, Leicester LE3 1TT	
Martin Swain Head of Internal Audit	+44 (0)7423 073933	m.swain@thewosgroup.com
Laura Battley Company Secretary and General Counsel	+44 (0) 7435 763006	l.battley@thewosgroup.com

### EXTERNAL

Safecall (UK)	0800 915 1571	<a href="http://www.safecall.co.uk/report">www.safecall.co.uk/report</a>
EthicsPoint (US)	1-844-643-2182	
Protect – Whistleblowing charity	+44 (0)203 117 2520	