

# THG

## Whistleblowing Policy

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April 2026

This policy applies to all THG employees, contractors, third-party groups, and suppliers.

The policy does not form part of any contract of employment and we may amend this policy at any time.

THG is committed to integrity, protecting assets and people, and fostering an open culture. We strive to operate ethically and responsibly, promoting transparent communication with colleagues and suppliers.

Effective, honest communication is crucial for addressing public interest concerns regarding breaches or wrongdoing. We rely on colleagues and suppliers to report issues misaligned with our values or legal obligations.

This policy is designed to conform to the **Public Interest Disclosure Act 1998 (PIDA) in the UK** and the **EU Directive on Whistleblowing in the EU**, ensuring a robust framework for protected disclosures.

## What is “Whistleblowing”?

Whistleblowing is the act of reporting suspected wrongdoing or misconduct within the business that is believed to be in the public interest and could potentially harm others, such as employees, customers, the wider public or the environment. This may include but is not limited to:

- **Criminal Activity:** Including financial crimes (fraud, money laundering, bribery, theft) and other illegal acts.
- **Breach of Legal Obligations:** Such as non-compliance with laws, regulations, or professional duties, including unauthorized disclosure of confidential information that violates a legal duty, and significant policy breaches that constitute a legal failing.
- **Danger to Health and Safety:** Any practices or conditions posing a risk to individual health and safety.
- **Damage to the Environment:** Concerns related to environmental harm.
- **Concealment:** The deliberate cover-up of any of the above serious wrongdoings.
- **Sexual Harassment:** Unwelcome conduct of a sexual nature that undermines an individual’s dignity or creates an intimidating, hostile, or offensive environment.

THG’s whistleblowing service is to all THG staff, casual workers, agency workers, consultants, contractors, suppliers and other third parties associated with THG (both current and former) to raise their concerns confidentially.

If you are uncertain whether something is within the scope of this policy you should seek advice, using the contact details within this policy.

## Whistleblower protection and confidentiality

THG is committed to supporting anyone who raises concerns in good faith, including our suppliers and partners. We will treat all reports confidentially and take appropriate steps to protect your identity.

Concerns can be raised anonymously, and we will not tolerate any form of retaliation or unfair treatment as a result of speaking up. If you are worried about possible reprisals or confidentiality, please let us know when raising your concern so we can discuss protective measures.

## How to raise a concern

We encourage you to raise concerns initially with your usual business contact, line manager, or relevant senior management. However, if you feel that you cannot talk to them, the following channels are available 24/7 and 365 days a year:

**E-mail** – please note your email address will be visible when using this option, if you do not wish to be contacted please state in your email: [whistleblowing@thg.com](mailto:whistleblowing@thg.com)

**Online submission** – the form provides the option to include your name and contact details or remain anonymous: [Whistleblowing submission form](#)

**Telephone** - this service will take you directly to an automated messaging service where you can share your concerns anonymously:

- UK: +44 161 884 9199
- US – Eastern time zone: +1 (347) 6920900
- US – Mid time zone: +1 (385) 2134500
- US – Western time zone: +1 (323) 7769900
- Poland: +48 (71) 8810081
- France: +61 (2) 85519060
- Germany: +49 89 54197125
- Spain: +34 919 26 54 99
- Australia: +61 (2) 85519060

While anonymous reporting is an option, providing your name or contact details significantly aids thorough investigations by allowing for clarification and further information gathering. To ensure a timely and effective investigation, please provide as much specific information as possible, including:

- A clear, factual description of the issue (what, when, where).
- Any supporting evidence (dates, times, names, documents, emails).
- Details of any previous actions taken or individuals already informed.
- Identification of potential witnesses or others with relevant information.
- The potential impact or consequences of the wrongdoing.

Please be assured that we will investigate all genuine concerns, even if you are unable to provide full supporting evidence at the time of your report.

### How we handle your concern

All calls, emails and online submissions are received centrally, and the investigation will be managed by an independent person or team.

Our SLA (Service Level Agreement) for an initial response to whistleblowing reports is 7 days from the date the whistleblowing is received. As a minimum, we will acknowledge every whistleblowing raised, except where the concerns have been raised anonymously.

Investigation timelines vary by concern. We aim to provide feedback and status updates within 3 months, extendable to 6 months if justified. Please note that full investigation details and outputs may not always be shared.

All personal data related to whistleblowing reports is processed in accordance with GDPR and retained only as long as necessary.

### Monitoring and review

This policy will be monitored annually to review its effectiveness and will be updated with necessary changes.

Version No.	Date of Review	Revision Notes	Approved by
1.0	April 2019	New Policy	Deputy Group CFO
2.0	August 2020	Review	Deputy Group CFO
3.0	September 2021	Review	CRO
4.0	November 2024	Review	Deputy Group CFO
5.0 (a)	September 2025	Review and update to include Suppliers	Deputy Group CFO
5.0 (b)	September 2025	Creation of condensed external policy	Deputy Group CFO
6.0 (b)	April 2026	Amendment	Group CFO

