

JD Sports Fashion Plc

Whistleblowing Policy

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Next Review Date:	March 2025
Person Responsible:	Nicola Kowalczuk
Version:	2

Whistleblowing

Objective

JD Sports Fashion Plc (“we” or “Company”) are committed to conducting business with integrity and in a respectful, honest, and ethical manner. If you observe or suspect misconduct, we will ask you to follow the process outlined within this policy. The aim of this policy is to reassure you that raising a concern and whistleblowing is safe and welcomed. It tells you where you can go to raise a concern or seek advice about the process to follow and what to expect when you do. Raising a concern can be about risk, wrong-doing, malpractice which affects colleagues, the public or the Company itself or even something that just does not feel right.

What is whistleblowing?

Some people interpret raising a concern as whistleblowing, while others interpret whistleblowing as involving something more formal or serious, such as possible fraud, danger, or malpractice, where the whistle blower may qualify for legal protection. This policy covers the reporting of all types of concerns, not only those which are formal. If there is something you have a concern about, we want you to feel confident in raising it.

About this Policy

The purpose of this policy is to help you raise a concern about any issue where you feel things are not as they should be.

At one time or another, anyone could have a concern about something happening at work. When concerns arise, they can usually be easily resolved. The Company encourages anyone with a concern to raise it to provide The Company the opportunity to review and act on the issue.

You may be worried about raising a concern or think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to Colleagues, managers, or the Company, or that it could affect how you are treated and your future at the Company. This policy sets out how we will support you to ease these worries.

If you have a concern, please let us know. If in doubt - raise it! Remember, remaining silent about possible misconduct could worsen a situation and undermine trust.

Who should follow this Policy?

We want this policy to reassure you that it is safe and appropriate to speak up. It applies to anyone directly employed by the Company, or any of its affiliates or subsidiaries, as well as officers, consultants, self-employed contractors, casual workers, agency workers, volunteers, and interns (“Colleagues”).

We all have a responsibility to support good governance and ensure good practice within the organisation. Raising a concern provides an opportunity to learn from it. It may help to influence changes so that we improve our workplace for everyone.

Who is responsible for this Policy?

The Company's management team are responsible for ensuring that the Company provides high quality services and is managed in a professional and ethical manner. We all have a responsibility to speak up about any genuine concerns regardless of whether this information is confidential.

The Chief People Officer is responsible for overseeing the integrity, independence, and effectiveness of The Company whistleblowing arrangements, including protecting the reporter from victimisation.

JD Sports will make Colleagues aware of this policy and process via the staff handbook. All Colleagues must be aware that failure to comply with this policy will be taken very seriously and may be treated as a disciplinary matter.

What to look out for

Concerns will come in various shapes and sizes; it could be anything. Below we have provided a non-exhaustive list of examples of the types of issues which may cause concern:

- unsafe working conditions
- unethical conduct
- inappropriate or unprofessional behaviour
- suspicions of fraud, bribery or corruption
- failure to comply with a legal obligation
- expenses being falsified
- environmental, health and safety human rights violation concerns' or
- disclosure of confidential information

If you have a concern, like any of the above, which is troubling you and which you think we should know about or look into, please use this policy. However, there is no restriction as to what sort of issue you can raise under this policy and the most important thing is that you do raise it.

Though, please remember, if your concern is about a personal issue, for example terms and conditions of employment, then the grievance policy might be the best route. The grievance policy also covers handling complaints of bullying or harassment, or disciplinary matters.

If you are not sure which policy to use, you can use this one to raise a concern and get advice on what to do next. You can also contact a member of the JD People Department or Chief People Officer for advice. If we believe that your concern can be more appropriately dealt with using a different process, we will explain this to you.

It is not necessary that you have proof or evidence of the act, a genuine concern is sufficient. Provided you are raising a genuine concern, it does not matter if you are mistaken, you will not be at risk of losing your job, nor will you suffer any detriment or retaliation as a result.

How will I be protected?

You will not suffer for raising a concern in good faith about suspected misconduct.

We will not tolerate any retaliation or the harassment or victimisation of anyone raising a genuine concern. It is very important to state clearly that any sort of or victimisation directed at someone who raised a concern in line with this policy is considered gross misconduct.

Deterring anyone from raising concerns or victimising them for doing so could amount to serious misconduct and may lead to disciplinary action.

How to raise a concern

If you have a concern, you can contact the Whistleblowing Helpline. We have engaged with One Trust, which is an external provider where you can report initial concerns. One Trust are an independent organisation that is not affiliated to the Company. You can contact them 24 hours a day, 365 days a year. The helpline is free of charge in all jurisdictions. Furthermore, One Trust can cater to all languages, and this will be used across all countries in which The Company operates.

The helpline also facilitates reporter confidentiality, as discussed below. The external provider reporting helpline is as follows: 0808 189 1053. Additionally, you can raise a concern via the One Trust online platform [here](#).

When raising your concern, explain the information or circumstances that gave rise to it as fully as you can. You do not need to have all the facts or evidence as long as you are raising your concern in good faith.

In many cases, issues and concerns are likely to be most effectively addressed within our own procedures. However, we recognise that there may be circumstances where you need or want to raise a concern to an outside body.

For example, if you wish to seek independent third-party advice about a concern you have, we recommend you contact Protect, the independent whistleblowing charity. They can be contacted via: 020 3117 2520, info@protect-advice.org.uk, <https://protect-advice.org.uk/contact-protect-advice-line/>

What information should you provide?

When filing a report, we encourage you to provide as much relevant information as possible. Detailed information enables us to assess and investigate concerns more thoroughly and to act where necessary.

This includes:

- A description of the situation that has caused you concern, as well as the history of the misconduct and examples of events.
- Names of people potentially involved, dates, places, and other relevant information.
- Any supporting evidence and documents related to your report. A raised concern can only be followed up if it contains enough information and there is a reasonable possibility of obtaining further information. Even if you do not have all the facts, we encourage you to speak up as



soon as possible and to share the facts that you do have. We do not expect you to have all the answers, and you are not expected to prove that the concern is well founded.

The Company will investigate the matter to determine whether there is a genuine reason for concern. Never investigate the matter yourself, and do not seek evidence to build a case.

Can I raise my concerns anonymously?

We recognise that there may be circumstances when you would prefer to speak to someone confidentially first i.e., the person to whom you report will not share details of what you raise which may identify you. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent, unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential, or we may be concerned for your own welfare. In such cases, we will discuss with you whether and how the matter can be best handled.

Please remember that if you raise a concern anonymously, it may be much more difficult for us to investigate the matter and provide feedback. There is also the possibility that in looking into the issue, you may become identifiable.

How will my concern be investigated?

It will be acknowledged within two working days. Upon receipt, it will be assessed, and appropriate next steps or actions will be considered and communicated to you. These may involve making informal inquiries, an informal internal review, or an internally or externally led investigation depending on the nature of the concern raised. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you.

If we have misunderstood the concern or there is any information missing at this stage, please let us know.

When you raise a concern, we would also like to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset.

If an investigation is needed, it will be handled as sensitively and speedily as possible, and depending on the nature of the concern, you will be notified of the expected timetable.

As far as we are able, and considering any confidentiality obligations, you will be kept informed of progress during the investigation and notified of any delays. At the end of the investigation, you will be advised of the outcome. However, please note that we may not be able to tell you about the precise actions we take where this may infringe a duty of confidence we owe to another person.

At any stage of our internal investigation some matters may need to be referred to an external body. If so, we will discuss with you how the matter can best proceed.

If you raise a concern either internally or externally you will be protected from retaliation, victimisation or other adverse treatment. If at any stage you experience reprisal, harassment,



victimisation, or any form of detriment for raising a genuine concern, please contact the Chief People Officer. Any behaviour of this nature is serious and could potentially be considered gross misconduct which can lead to dismissal.

What if my concern is not addressed?

If you feel that your concern has not been resolved satisfactorily, you may report the matter to one of the contacts listed in Appendix 1. They will carefully consider the issue and will speak to you to see if they or someone else is better placed to deal with your concern.

Records

Whistleblowing related records are securely retained by us and will be held for six years. For formal whistleblowing concerns, a report of the outcomes will be referred to the Chief Financial Officer.

Policy Ownership

The Audit Committee has overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations.

The Chief People Officer has primary responsibility for implementing the policy and the day-to-day operations of monitoring its use and effectiveness together with dealing with any queries about it.

Amendments to the policy can be made at any time.

Appendix 1

Contact Details

Name	Role	Email Address	Telephone No.
Nicola Kowalczyk	Chief People Officer	nicola.kowalczyk@jdplc.com	0161 767 1000
Regis Schultz	Group CEO	regis.schultz@jdplc.com	0161 767 1000
Dominic Platt	Group CFO	dominic.platt@jdplc.com	0161 767 1000
Theresa Casey	General Counsel & Company Secretary	theresa.casey@jdplc.com	0161 767 1000
Helen Ashton	Chair of Audit & Risk Committee	helen.ashton@jdplc.com	0161 767 1000