

**JD Sports Fashion PLC**

**Whistleblowing Policy**

**FOR INTERNAL AND EXTERNAL PUBLICATION**

## INTRODUCTION

JD<sup>1</sup> aims to conduct its business with integrity, honesty and in accordance with the highest standards. However, like any organisation, JD is aware that there is a risk of wrongdoing or malpractice occurring, from time to time.

Encouraging a culture of openness is important to JD and JD encourages its employees and those with whom it does business to raise any concerns they may have in relation to any wrongdoing or malpractice. This policy<sup>2</sup> establishes the means to notify JD about any such concerns.

If there is any practice or behaviour that you reasonably consider constitutes unlawful activity that JD should know about, please use the procedure set out in this policy document. The reporting of genuine concerns will not adversely affect your employment or business relationship with JD.

## POLICY & PROCEDURES

### 1. GUARANTEE

**Anyone raising a genuine concern using the process set out in this policy document will not under any circumstances suffer any form of detriment or disadvantage as a result of having raised their concern.**

All concerns properly raised under this policy will be treated seriously and in confidence. Unless required to do so as a matter of law, JD will not disclose any information, other than in accordance with the terms of this policy, without the prior consent of the person who raised the concern.

### 2. TO WHOM DOES THE POLICY APPLY?

This policy is designed to provide guidance to directors, employees, suppliers and contractors, who may, from time to time, feel that they need to raise certain issues relating to JD with someone in confidence.

### 3. TYPES OF INAPPROPRIATE ACTIVITY COVERED BY THIS WHISTLEBLOWING POLICY

This policy will apply in cases where you genuinely and in good faith believe that one of the following sets of circumstances is occurring, has occurred or may occur within JD and that it is in the public interest for such circumstances to be disclosed:

- financial or accounting fraud, corruption, bribery or other financial impropriety;

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<sup>1</sup> For the purposes of this policy, 'JD Sports' means JD Sports Fashion PLC and all its subsidiaries from time to time.

<sup>2</sup> This policy is separate and distinct from the Grievance Procedure. If you have a complaint about your own personal circumstances, you should use the Grievance Procedure. The Whistleblowing process should be used only to raise concerns about malpractice or wrongdoing within JD.

- significant deficiencies or material weaknesses in the group’s system of internal controls or any other significant weakness related to auditing or accounting matters which may have a material effect on the group’s financial statements;
- the improper use of confidential or commercially sensitive information;
- the improper use of insider information for dealing in the shares of any company whose shares are listed on a recognised stock exchange;
- the failure to disclose information or the destruction of documents which should be disclosed to others in the group or any applicable regulatory body;
- a criminal offence or a failure to comply with legal obligations;
- the health and safety of any individual has been, is being or is likely to be endangered;
- a failure to comply with the JD Group’s policies, procedures or internal controls; or
- the deliberate concealment of information relating to any of the above.

#### 4. REPORTING PROCEDURES

Any person concerned about wrongdoing or malpractice involving or relating to JD or its dealings with customers, suppliers or business partners should follow the procedure set out below.

##### 4.1 JD Employees

**Stage 1** - Tell your immediate supervisor or line manager

You should raise any concern with your immediate supervisor/line manager in the first instance.

If your supervisor/line manager is not contactable, your concern relates to him/her, or it is inappropriate to involve him/her for some other reason, you should go directly to stage 2 in the escalation process.

**Stage 2** – Either email or contact any of the persons below who will treat the matter in confidence or call the hotline on 0800 3762010

Chief Financial Officer	Neil Greenhalgh <a href="mailto:Neil.greenhalgh@jdplc.com">Neil.greenhalgh@jdplc.com</a>
Group HR Director	Julie Blomley <a href="mailto:julie.blomley@jdplc.com">julie.blomley@jdplc.com</a>
Group Company Secretary	Siobhan Mawdsley <a href="mailto:siobhan.mawdsley@jdplc.com">siobhan.mawdsley@jdplc.com</a>

All of the above can be contacted at JD's registered office :

Edinburgh House  
Hollinsbrook Way  
Pilsworth  
Bury  
BL9 8RR

All correspondence should be marked **'Strictly private and confidential - to be read by addressee only'**.

**Stage 3** – If you are still concerned

If you have raised your concern via stage 1 and/or 2 of the process but are not satisfied that it has been addressed adequately, or you believe that the matter is so serious that it cannot be raised through these stages, you should raise it in writing directly with the Executive Chairman of JD Sports Fashion Plc, Peter Cowgill ([peter.cowgill@jdplc.com](mailto:peter.cowgill@jdplc.com)).

**4.2 Persons other than JD Employees**

Please follow the process from stage 2 as described above for JD employees.

**Raising Concerns Anonymously**

You may raise your concern anonymously and can do so by calling the hotline referred to above.

For any queries about this policy please contact the Group Company Secretary, Siobhan Mawdsley ([siobhan.mawdsley@jdplc.com](mailto:siobhan.mawdsley@jdplc.com)).