

SLICK STITCH COMPANY SPEAK UP POLICY

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SLICK STITCH EMBROIDERY COMPANY LTD

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SPEAK UP POLICY

Our Company is committed to conducting business on a daily basis with fairness, integrity and respect for the law and our values. In spite of this commitment, you may one day observe conduct that seems to violate the law, our Code of Business Conduct and/or its policies and Rules. If you observe or suspect such misconduct, you are encouraged to Speak Up. By doing so, you give our Company the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust.

Our Company truly values the help of employees who identify and Speak Up about potential concerns that need to be addressed. Speaking Up is encouraged and employees who Speak Up are protected. You will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for Speaking Up. After all: Speaking Up is essential for us to sustain our reputation, success and ability to operate - both now and in the future.

What is the purpose of this Speak Up policy?

The purpose of this policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what you can expect from our Company if you Speak Up.

Who can Speak Up?

This Speak Up policy is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship (such as business partners, suppliers, shareholders, agents, distributors, representatives and customers) who wish to raise a concern about possible misconduct within our Company.

What concerns are covered by this Speak Up policy?

This Speak Up policy can be used to raise concerns about suspected misconduct within our Company, that is: any violation of the law, our Code of Business Conduct and/or its policies and Rules under which our Company operates. Employees are expected to report any fraud or good faith suspicion thereof as explained in the Fraud Policy.

Examples of concerns that can be raised using this Speak Up policy are:

- Fraud
- Environmental, health and safety issues
- Discrimination or harassment
- Improper use of company resources
- Violations of competition laws and rules
- Insider trading
- Inadequate financial or non-financial recordkeeping
- Disclosure of confidential information
- Conflicts of interest
- Violations of our policies on gifts, entertainment and hospitality
- Bribery

Do not use this policy:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or call your country emergency phone number.
- For any grievances you may have in relation to your terms of employment.
- To settle personal disputes.
- To make accusations which you know are false. Doing so may lead to disciplinary measures.

Guidance on how and when to Speak Up

How to Speak Up?

Our Speak Up policy allows you to raise concerns about suspected misconduct through a variety of channels. This policy does not replace our Company's regular reporting lines or complaints procedures. Should you suspect any misconduct, you are encouraged to address this directly with the person involved. If this would not be appropriate, please feel free to raise questions and concerns through any of the following Speak Up channels.

Your manager, HR representative, internal auditor or legal counsel

As a general guideline, the first person to approach when raising a concern is your line manager/supervisor. You may also choose to discuss your concern with your HR representative or legal counsel who can mediate personally on your behalf.

Your Trusted Representative

Our Company has appointed Trusted Representatives as a further point of contact for you to raise concerns about suspected misconduct, for example when raising a concern with your line manager is not preferred by you. They are there for you to discuss your concerns in confidence and advise on any next steps. Trusted Representatives do not participate in any investigation as to protect the confidentiality of conversations with Trusted Representatives.

What kind of information do you need to provide?

When you file a report (in person, in writing, online or by phone), please provide as much detailed information as you have to enable our Company to assess and investigate your concern, such as:

- the background, history and reason for the concern
- names, dates, places and other relevant information
- any documents that may support your report

A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

What should you do if you do not have all the facts?

We encourage you to Speak Up as soon as possible, ideally before situations get out of hand or damage is done. It is always better to discuss upfront than to report afterwards. If you know about or suspect misconduct, Speak Up with the facts you have. We do not expect you to have all the answers and you are certainly not expected to prove that your concern is well founded. Let our Company look into the matter to determine if there is a reason for concern.

Never investigate the matter yourself and do not seek evidence to build a strong case. We guarantee that no disciplinary measures or other steps will be taken against you if your genuine concern later turns out to be mistaken or misguided.

Safeguarding your position: confidentiality and non-retaliation

Do reports remain confidential?

All reporting is done confidentially. This means that information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake. In principle, we are obliged to inform the implicated person that a complaint has been filed against him/her, but your identity will not be disclosed. You yourself can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

Is it possible to report anonymously?

You can share your concerns anonymously (where allowed by the laws of your country). We do however encourage you to reveal your identity as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously.

Will your privacy be safeguarded?

Our Company is committed to protecting the privacy of everyone involved. We will do everything reasonable to safeguard personal data from unauthorized access and processing. Any personal data obtained as part of this Speak Up policy will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

Non-retaliation - How will you be protected if you Speak Up?

Speaking Up is encouraged and employees who Speak Up 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 treated as a disciplinary matter. You will not be protected, however, if you maliciously raise a concern that you know is false.

What happens if this policy is misused?

It is a violation of our Code of Business Conduct to knowingly make a false accusation, lie to investigators, interfere with an investigation or refuse to cooperate in an investigation. Doing so may lead to disciplinary measures.

Follow-up - What happens after you Speak Up?

What can you expect if you Speak Up?

Our Company takes every report of possible misconduct seriously. If you submit a report, you will receive a confirmation of receipt within 5 to 7 working days, with an estimate of

how long it will take to handle and assess your concern. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. On average, closure of the matter can be expected within 1 to 3 months. You will be informed of the overall findings, i.e. whether or not our Company has established that misconduct has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

Please put your report in writing to:

Executive Assistant
Old Health Road
Wolverhampton
WV1 2BF

Who will act on your concerns and how?

All concerns that are received by our Company are logged into a case management system. Depending on the nature, urgency and potential impact of your concern, the case will be handled by a Manager who works under the supervision and instruction of the Integrity Committee.

Review and investigations

Our Company follows a two-phased approach when handling concerns:

- **Initial review and inquiries** - The purpose is to assess the concern and decide if it requires further review and investigation (and, if so, by whom and in which form). You may be approached for additional information.
- **Further review and investigation** - If the report requires further review and investigation, a Case Manager will be assigned. The investigation itself will focus on an objective, factual analysis of the case. If needed, outside experts (e.g. lawyers or accountants) can be engaged to assist in the investigation. They will work under strict confidentiality.

Review and investigation will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles (including fair hearing). Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.

What is expected of you in connection with investigations?

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Lying to the people performing the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Appropriate measures

If your concern is well-founded (i.e. misconduct has indeed taken place), appropriate measures will be taken where necessary and in accordance with the law and our Policy on Disciplinary Measures.

What to do if you have a concern about the follow-up on a report?

If you believe that your concern or a concern raised against you has not been handled appropriately or that an investigation has not been performed correctly, please inform the Directors.