

WHISTLEBLOWING & SPEAK UP POLICY & PROCEDURE

1. INTRODUCTION

Greencore Group Plc ('Greencore' or the 'Group') is committed to ensuring (i) the highest standards of openness and transparency are maintained; (ii) adherence to legislation and regulation; (iii) compliance with Group policies; and (iv) accountability.

An important element of the aforementioned is ensuring everyone who works with, or on behalf of, Greencore ('Stakeholders') can raise concerns in a responsible and effective manner, without the risk of any reprisal.

2. SCOPE AND PURPOSE

The Greencore Group Whistleblowing and Speak Up Policy (the 'Policy') is designed to enable Stakeholders to raise concerns internally and at a sufficiently high level to ensure that such concerns are investigated appropriately. Examples of concerns may include, but are not limited to, the following:

- The offering, taking, or soliciting of bribes
- Financial fraud or mismanagement
- Unauthorised disclosure of confidential information
- Criminal activity
- Actual or potential danger to health & safety
- Food safety concerns
- Release of potentially damaging materials into the environment
- Failure to comply with legal or professional obligations or regulatory requirements
- Mis-selling or price fixing of products
- Misreporting of performance of the business
- Negligence
- Bullying or harassment
- Conduct likely to damage a customer's brand and reputation
- Concealment of any of the above matters
- Product fraud or non-conformance to specification to benefit the supplier,
- Poor treatment of workers or illegal or inappropriate personnel procedures

3. SAFEGUARDS

- 3.1. Protection - this Policy is designed to offer protection to all who disclose such concerns provided that the disclosure is made in good faith.
- 3.2. Confidentiality - the Group will treat all such disclosures in a confidential and sensitive manner. The identity of the individual who has raised the concern may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

- 3.3. Anonymous Allegations - this Policy encourages individuals to put their name to any disclosures they make if they feel comfortable in so doing. However, the Group pledges to fully investigate any anonymous claim to the same extent as a claim where the individual who has raised the concern chooses to disclose their name.
- 3.4. Untrue Allegations - If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making such allegations, disciplinary action may be taken against that individual.

4. PROCEDURES FOR RAISING A CONCERN - INTERNALLY

- 4.1 Colleagues within the Group should consider whether they can raise their concern through either their line manager or their local HR representative. Concerns may also be raised via the Group Head of Risk Management.
- 4.2 Where appropriate an employee may wish to make use of the Greencore Grievance process details of which are available on the intranet or by following this link: <https://thegreencoreway.com/people-at-the-core/colleague-policies/>
- 4.3 On receipt of a raised concern, the member of staff should inform the Group Head of Risk Management as soon as practical. That member of staff will be deemed the 'investigating officer' of the incident.
- 4.4 The Group pledges that all concerns raised will be fully and appropriately investigated.
- 4.5 The Group has a zero-tolerance policy for anyone who retaliates against an individual for validly raising a concern.

5. PROCEDURES FOR RAISING A CONCERN – EXTERNALLY: NAVEX GLOBAL

- 5.1 If, for whatever reason, the employee is not able, or not comfortable, to raise their concern through the channels detailed in Section 4.1, then the employee should raise their concern through the dedicated confidential hotline operated by NAVEX GLOBAL.
- 5.2 NAVEX GLOBAL is a completely independent organisation with impartial staff trained to handle these types of calls. Calls are in total confidence, and will not be traced or recorded, and the caller's name is not asked for. The information given to NAVEX GLOBAL will be passed onto the Head of Risk Management who will ensure that an appropriate Greencore Senior Executive is deployed to investigate the concern raised. This individual shall be deemed the 'investigating officer' and will investigate the concern raised, without compromising the individual who made the call.

5.3 NAVEX GLOBAL can be contacted 24 hours a day, 7 days a week either by telephone or via a website (<http://greencore.ethicspont.com/>). The toll-free contact telephone number is: **(UK): 0800 015 9726 or (Ireland) 1800 901 786.**

6. TIMESCALES

6.1 Due to the varied nature of concerns raised, which may involve internal/external investigators and/or the police, it is not possible to set out precise timescales for such investigations. The investigating officer will ensure that investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations. The Group aims to complete investigations within 28 days wherever possible.

6.2 Where the individual who has raised the concern chooses to give their name, the investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the individual who has raised the concern and thereafter report back the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the individual who has raised the concern informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded. All responses to the individual who has raised the concern should be in writing and sent to their home address marked "confidential".

6.3 For a concern raised via NAVEX GLOBAL, feedback from the investigating officer will be available via NAVEX Global within 28 days of the concern being raised if possible (depending on the type of concern referred to in 6.1)

7. INVESTIGATING PROCEDURE

7.1 The investigating officer should follow the following steps:

- Full details and clarifications of the concern raised should be obtained.
- The investigating officer should inform the member of staff against whom the concern has been raised as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union representative or work colleague at any future interview or hearing held under the provision of these procedures. At the discretion of the investigating officer and dependent on the circumstances of the concern raised, an alternative representative may be allowed e.g. the individual's legal representative.
- The investigating officer should consider the involvement of the Company's external auditor, the police, or any other relevant authority at this stage and should consult with the relevant Group Executive Team member if appropriate.
- The concern should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals/bodies.

- A judgement concerning the concern and validity of the concern will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the relevant Group Executive Team as appropriate.
- The relevant Group Executive Team member will decide what action to take. If the concern raised is shown to be justified, then they will invoke the disciplinary or other appropriate Group procedures.
- The individual who has raised the concern shall be kept informed of the progress of the investigations unless it would be inappropriate to do so, and shall also be informed of the outcome, if deemed appropriate.

7.2 If the individual who has raised the concern is not satisfied that the concern is being dealt with in an appropriate manner by the investigating officer, they have the right to raise it in confidence with the Group Executive Team, or with the Group Head of Risk Management or Group Head of Legal and Compliance.

7.3 If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the individual who has raised the concern is not satisfied with the outcome of the investigation, the Group recognises the lawful rights of colleagues and ex-colleagues to make disclosures to prescribed persons or body (e.g. the Health and Safety Executive). A full list of prescribed people and bodies can be found on the Government Website (www.gov.uk).

8. UPHOLDING STANDARDS OF THE WHISTLEBLOWING & SPEAK UP POLICY

8.1 New colleagues should be informed of and given the contact details of NAVEX GLOBAL during their induction.

8.2 NAVEX GLOBAL signage including contact details should be displayed across each site such that all staff have ease of access to the contact telephone numbers and the website.

8.3 This Policy will be included in the Risk Management work programme and reviewed against Group and legislative requirements and best practice guidelines, to ensure all aspects of the requirements are covered and the Policy is kept up-to-date and relevant.

9. MONITORING & REVIEW

This document will be monitored annually by the Company to review its effectiveness and will be updated in accordance with necessary changes.

Issue	Issue Date	Author	Revision Notes
1	2018	Risk Management Group	New policy

2	Sep 2020	Risk Management Group	Policy revision
3	Oct 2020	Risk Management Group	Policy re-name and purpose format