



Group Whistleblowing & Speak Up Policy

VERSION CONTROL		DOCUMENT CONTROL	
Effective From	September 2023	Policy Owner	Director Internal Audit and Risk Management
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1. Introduction and Purpose

- 1.1. Whistleblowing is the action a colleague takes when reporting suspected wrongdoing at Greencore outside the normal management channels.
- 1.2. Greencore is committed to ensuring the highest standards of openness, transparency and accountability, creating an environment in which colleagues can feel safe and protected from issues that could harm themselves, others and/or Greencore.
- 1.3. The purpose of this document is to set out a common approach and minimum requirements for Whistleblowing activities across Greencore for use by all colleagues.

2. Scope

- 2.1. The policy provides a framework that enables colleagues to raise concerns internally and ensures appropriate independent investigations are undertaken. 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.
 - Product fraud or non-conformance to specification to benefit the supplier.
 - Poor treatment of workers or illegal or inappropriate personnel procedures.
 - Concealment of any of the above matters.

3. Safeguards

- 3.1. **Protection** – colleagues that make a whistleblowing report will be protected, provided the disclosure is made in good faith. If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be

taken against that individual. If, however, an individual makes malicious or vexatious allegations, and particularly if they persist with making such allegations, disciplinary action may be taken against that individual.

- 3.2. **Confidentiality** – all reports will be treated in a confidential and sensitive manner. The identity of whistleblowers may be kept confidential so long as it does not hinder or frustrate any investigation.
- 3.3. **Anonymity** - this Policy encourages individuals to put their name to any disclosures if they feel comfortable. However, Greencore pledges to fully investigate any anonymous claim to the same extent as a claim where the individual discloses their name.

4. Raising a Concern

- 4.1. In the first instance colleagues should consider whether they can raise their concern through either their Line Manager or Local HR Representative. If, for whatever reason, they are not able, or comfortable to do so, they can raise their concern directly with the Director Internal Audit & Risk or through the dedicated confidential hotline operated by NAVEX.
- 4.2. NAVEX are a completely independent organisation with impartial staff trained to handle these types of calls. Calls are in total confidence, will not be traced or recorded, and callers can choose to remain anonymous. The information provided will be passed onto the Internal Audit & Risk team who will ensure that an appropriate, independent investigation is undertaken.
- 4.3. NAVEX can be contacted 24 hours a day, 7 days a week either by telephone or via the internet (<http://greencore.ethicspont.com/>). The toll-free contact telephone number is: (UK): 0800 015 9729 or (Ireland) 1800 901 786.

5. Investigation Procedure

- 5.1. Investigations will incorporate the following key steps:
 - a. Full detail on information provided in the whistleblowing report will be obtained by the Internal Audit & Risk team.
 - b. An independent investigating officer will be appointed by Internal Audit & Risk. Consideration will be given to the involvement of the Company's external auditor, the police, or other relevant authority if appropriate.
 - c. The concern will be fully investigated by the investigating officer with the assistance where appropriate, of other individuals/bodies.

- d. A judgement will be made on the validity of the concern by the investigating officer. This judgement will be detailed in written feedback to the Internal Audit & Risk team.
 - e. The investigating officer will make recommendations on any further action required following completion of the investigation. Where required, this will be escalated through to the Senior Management/Executive team and disciplinary and other appropriate group procedures may be invoked.
 - f. Individuals who raise concerns will be kept informed on progress and outcomes of investigations unless it would be inappropriate to do so.
- 5.2. The investigating officer will ensure that investigations are undertaken as quickly as possible without affecting quality and scope. Greencore aims to complete investigations within 28 days wherever possible although due to the varied complexity of concerns raised, this timeline will sometimes be extended.
- 5.3. If the individual who has raised the concern is not satisfied that the concern has been dealt with in an appropriate manner, they can raise it in confidence with the Greencore Executive Team, or the Director Internal Audit & Risk.
- 5.4. If the investigation finds allegations are 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, Greencore recognises the lawful rights of colleagues and ex-colleagues to make disclosures to prescribed persons or bodies (e.g., the Health and Safety Executive). A full list of prescribed people and bodies can be found on the [Government Website](#).
- 5.5. Regular status updates on all Whistleblowing cases are made to the Chief People Officer (CPO) in addition to quarterly reporting into the Group Audit and Risk Committee (ARC).

Document History

Date	Version	Comments
July 2023	V1.0	Policy created
Sept 2023	V1.1	Reviewed and updated