



# Policy



# Speak Up

Executive sponsor	Chief People Officer	Review Date	1 <sup>st</sup> September 2025
Policy Owner	Director Internal Audit, Risk Management, Controls & Compliance	Effective date	1 <sup>st</sup> September 2024
Policy Lead	Head of Internal Audit	Version	1.2

# Introduction

## Purpose

Greencore's whistleblowing process is referred to as Speak Up. Speak Up is the action a colleague takes when reporting suspected wrongdoing at Greencore outside the normal management channels.

The purpose of this document is to set out a common approach and minimum requirements for Speak Up activities across Greencore for use by all colleagues.

## Scope

This policy applies to all employees, non-executive directors, consultants, contractors, agency workers, interns and any other individuals or entities acting on behalf of Greencore. We all have a duty to recognise, and report concerns where a potential, perceived or actual non-compliance has arisen.

This policy provides a framework that enables colleagues to raise concerns internally and ensures appropriate independent investigations are undertaken. Examples of concerns that should be raised in this policy may include, but are not limited to, the following:

- Criminal activity or negligence.
- Failure to comply with legal or professional obligations or regulatory requirements.
- Actual or potential danger to health & safety.
- Food safety concerns.
- Financial fraud or mismanagement, misreporting business performance, offering, taking, or soliciting of bribes,
- Unauthorised disclosure of confidential information.
- Release of potentially damaging materials into the environment.
- Bullying or harassment (including sexual harassment), poor treatment of workers or illegal or inappropriate personnel procedures.
- Mis-selling or price fixing products,
- Product fraud or non-conformance to specification to benefit a supplier.
- Concealment of any of the above matters.

This policy should be used when you have a genuine belief that an incident, potential non-compliance or actual non-compliance has or is likely to occur.

## Policy Statement

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.

**Protection** – colleagues that make a Speak Up 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.

**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.

## Policy Requirements

### Raising a Concern

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 and C&C or through the dedicated Speak Up hotline and website operated by an independent provider. NAVEX. Some of Greencore's retail customers offer their own anonymous whistleblowing hotlines. The details for these alternative hotlines are not published or displayed at Greencore sites, but colleagues may choose to use them.

NAVEX are a completely independent organisation with impartial staff trained to handle these types of calls. Calls and website reports will not be traced or recorded, and callers / reporters 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.

NAVEX / Speak Up can be contacted 24 hours a day, 7 days a week either by telephone or via the internet <http://greencore.ethicspoint.com>. The toll-free contact telephone number is: (UK): 0800 015 9729 or (Ireland) 1800 901 786. To ensure accessibility for staff with language barriers, posters with these details, in multiple languages, are displayed at all sites and depots. NAVEX also have call handlers who speak a variety of languages.

### Investigation Procedure

Investigations will incorporate the following key steps:

Full detail on information provided in the Speak Up report will be obtained by the Internal Audit & Risk team.

An independent investigator 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.

The concern will be fully investigated by the investigator with the assistance where appropriate, of other individuals/bodies.

A decision 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.

The investigator 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.

Individuals who raise concerns will be kept informed on progress and outcomes of investigations unless it would be inappropriate to do so, for example where providing the information could breach current laws and regulations. Individuals can request advice on their report or the reporting process via NAVEX which Internal Audit & Risk will also support if required.

The investigator 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.

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 with the Greencore Executive Team, or the Director Internal Audit, Risk and Compliance & Controls.

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 [Whistleblowing: list of prescribed people and bodies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-list-of-prescribed-people-and-bodies).

Regular status updates on all Speak Up cases are made to the Chief People Officer (CPO) in addition to quarterly reporting into the Group Audit and Risk Committee (ARC). This governance is in place to ensure there is stakeholder engagement and feedback on the design, implementation, and review of the Speak Up process and to enable outcomes to be assessed as consistent with best practice and internationally recognised human rights standards.

## Roles and Responsibilities

**All employees:** Are expected to raise issues and concerns, preferably with a line manager or trusted colleague first, but if colleagues are not able or comfortable to do so, by using the Speak Up website or hotline.

**Internal Audit (IA):** Will review the information provided in confidence and assign a suitable internal investigator to perform the review. IA will track the progress of the investigation to completion, assess the findings and ensure any necessary corrective actions are identified, appropriate and undertaken. Individuals who raise concerns will be kept informed on progress, and outcomes of investigations unless it would be inappropriate to do so. IA will also ensure communication plans are regularly reviewed and refreshed to ensure continuing awareness of Speak Up for all colleagues (e.g. as part of induction training, via posters in multiple languages and TV screens on site, emails, intranet and employee app campaigns). IA will perform at least annual reviews of cases received to identify patterns, lessons learned, or areas for improvement.

**Internal Investigator:** Will conduct formal or informal inquiries dependant on the nature of the information to determine if any policies, regulations or expected behaviours fall below the standard expected by the Group.

## Policy Governance

**Policy Review:** This policy will be reviewed annually and updated as necessary to ensure its effectiveness and alignment with current laws and regulations.

Version	Date	Comments
1.0	1 <sup>st</sup> July 2023	Policy Created
1.1	1 <sup>st</sup> September 2023	Reviewed and updated
1.2	1 <sup>st</sup> September 2024	Reviewed and updated on new template.

## Supporting Information

**Legal Framework:** EU Whistleblowing / Speak Up Directive 2018, Protective Disclosures Act 2014, Protected Disclosures (Amendment) Act 2022, Employment Rights Act 1996

Information Resource	Title	Owning Function
Document	Speak Up Policy	Internal Audit
System	Speak Up System	Internal Audit
Document	Code of Conduct	Legal

## Supporting Information

Information Resource	Title	Owning Function	Location / Link



## Appendices

**Name** – Description text