Group Policy

Greencore

Speak Up

Executive sponsor	Chief People Officer (CPO)	**Lead**	Head of Internal Audit
Owner	Director, Internal Audit, Risk and Controls	**Effective date**	1st September 2026
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Contents

Executive Summary **3**

Introduction **4**

Purpose 4

Scope 4

Policy Statement **5**

Policy Requirements **5**

Roles and Responsibilities **6**

Supporting Information **7**

Policy Governance **7**

Executive Summary

What all colleagues need to know:

- **Speak Up is available to colleagues and external stakeholders**, including suppliers, customers and business partners, who wish to report a concern relating to Greencore.
- **Speak Up is Greencore's whistleblowing process** and should be used where there is a genuine concern about suspected wrongdoing, misconduct, legal or regulatory non-compliance, health and safety, food safety, fraud, harassment, or other serious concerns.
- **Colleagues should raise concerns through their line manager or local HR where appropriate,** but if they are not comfortable doing so, they can report directly to Internal Audit or use the independent NAVEX Speak Up hotline or website.
- **Reports can be made anonymously** and will be investigated as fully as possible, whether or not the individual chooses to provide their name.
- **Greencore will protect anyone who raises a concern honestly and in good faith** and does not tolerate retaliation against anyone who raises a concern or supports an investigation.
- **Personal employment matters**, such as pay queries, holiday disputes or routine performance discussions, are usually better handled through HR or grievance procedures rather than Speak Up.

Introduction

Purpose

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

At Greencore, we want everyone to feel confident to raise concerns where something does not seem right. Speaking up helps us protect our colleagues, customers, consumers, business partners and the reputation of our business.

The purpose of this document is to set out a common approach and minimum requirements for Speak Up activities across Greencore and explain how colleagues and external stakeholders can raise concerns.

Scope

This policy applies to all Greencore employees, non-executive directors, consultants, contractors, agency workers and interns. Suppliers, customers, business partners and other external stakeholders may also use Greencore's Speak Up process to report concerns relating to Greencore's activities, operations or business relationships.

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.

Personal employment concerns affecting only the individual raising them will usually be more appropriately managed through local HR or grievance procedures. For example:

- Routine performance discussions.
- Pay queries.
- Holiday disputes.
- Minor interpersonal concerns.
- HR administrative issues.

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 – Greencore will protect anyone who raises a concern honestly and where they reasonably believe the information disclosed is true, including colleagues, suppliers and other external stakeholders, even if the concern is not ultimately substantiated.

Greencore prohibits any form of retaliation against an individual who raises a concern in good faith, assists in an investigation, or provides information relating to a Speak Up report.

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.

Confidentiality - All concerns will be handled confidentially to the fullest extent possible. Information relating to a Speak Up report will only be shared with those who have a legitimate need to know, to assess, investigate, or resolve the matter.

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 Controls or through the dedicated Speak Up hotline and website operated by NAVEX.

NAVEX are a completely independent organisation with impartial staff trained to handle these types of reports. Calls and website reports can be submitted anonymously and are managed in accordance with applicable data protection and privacy requirements.

Suppliers and other external stakeholders can raise concerns directly through the independent NAVEX Speak Up hotline or website. They are not expected to raise concerns through Greencore management or HR before using these channels.

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, (Ireland) 1800-901-786, (United States) 844-930-2863, or (Spain) 900-876-121.

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.

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.

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 team.

An independent investigator will be appointed by Internal Audit. 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 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 will also support if required.

All other relevant stakeholders, including suppliers and customers, will be kept informed of cases that impact them, where this is appropriate and consistent with our confidentiality obligations.

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 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).

Regular status updates on all Speak Up cases are made to the CPO in addition to quarterly reporting into the Group Audit and Risk Committee (ARC).

Roles and Responsibilities

All colleagues: 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 work with relevant functions to ensure Speak Up reporting channels are appropriately communicated to suppliers and other external stakeholders. 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 dependent on the nature of the information to determine if any policies, regulations or expected behaviours fall below the standard expected by the Group.

Supporting Information

Legal Framework: EU Whistleblowing Directive (EU) 2019/1937, Protected Disclosures Act 2014, Protected Disclosures (Amendment) Act 2022, Part 4A of the Employment Rights Act 1996, as inserted by the Public Interest Disclosure Act 1998, Employment Rights Act 2025.

Policy Governance

Version	Date	Comments
1.0	1st July 2023	Policy Created
1.1	1st September 2023	Reviewed and updated
1.2	1st September 2024	Reviewed and updated on new template
1.3	1st September 2025	Reviewed and updated
1.4	1st September 2026	Reviewed and updated