

Group Whistleblowing Policy

1. Introduction

- 1.1 In addition to the requirements detailed within the Public Interest Disclosure Act 1998 the Company is committed to the highest possible standards of openness, integrity and accountability and encourages any individual who has genuine concerns about any form of malpractice within the business to raise these concerns at the earliest opportunity.
- 1.2 More often than not, an individual's concerns are relatively minor and can be resolved through existing procedures such as the Company's Grievance Procedure or via a one-to-one with a manager or the HR department. However, when such concerns are about unlawful conduct, financial malpractice or constitute a danger to the public, employees or the environment, it can be difficult to know what to do.
- 1.3 Confidential reporting or 'whistleblowing' is about helping people to raise legitimate concerns or worries about our business activities and practices, and in so doing giving the business the opportunity to investigate and correct these.
- 1.4 This policy tells you how you can raise a concern in the knowledge that it will be treated seriously and investigated properly. This policy aims to provide protection for contracted employees, including agency workers, against detriment or dismissal on the ground that they have disclosed, in good faith, a concern that suggests malpractice within the business.

2. Concerns covered by this Policy

- 2.1 The policy is intended to deal with serious or sensitive concerns about wrongdoings in the following areas:
- a) Criminal activity.
 - b) Failure to comply with a legal obligation.
 - c) Miscarriages of justice.
 - d) Health and safety risks, including risks to the public as well as other employees.
 - e) Damage to the environment.
 - f) Financial malpractice.
 - g) Impropriety or fraud.
 - h) Any other unethical or improper conduct.
 - i) Attempts to conceal information about any of the above.
 - j) Unauthorised disclosure of confidential information.
 - k) Supplying food unfit for consumption.
 - l) Mis-selling or price fixing of products.
 - m) Mis-reporting performance of the business.
 - n) Negligence.
 - o) Animal Welfare.
 - p) Biosecurity.
 - q) Conduct likely to damage a Customers brand and reputation.
 - r) The deliberate concealment of any of the above matters.

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- s) Product fraud or deliberate non-conformance to specification in order to benefit the supplier.
- t) Treatment of workers, illegal personnel procedures.
- u) Inappropriate or non-values behaviour by Retailer representatives or those operating on their behalf.

2.2 This list is an indication of the forms of malpractice which may cause concern but is not exhaustive in any sense. Individuals are encouraged to report any form of malpractice causing them concern.

3. Protection against victimisation

3.1 The Company appreciates that the decision to raise a concern can be a difficult one to make, not least because there may be a fear of reprisal from those who may be committing malpractice or others who may be involved. The Company will not tolerate victimisation of any person who raises a concern in good faith, even if it transpires that no malpractice has occurred, or is likely to occur, and will take appropriate steps to protect them, including taking disciplinary action, against anyone who is found to be pursuing any form of retaliation or has threatened to do so.

4. Confidentiality and Anonymity

4.1 The Company recognises that an individual may not wish to be identified during the course of raising a concern. In such circumstances, the Company will do everything possible to protect the person's identity and will not disclose it without their consent. However, confidentiality cannot be absolutely guaranteed as the very fact of the investigation may serve to reveal the source of the information, the statement of the person raising the concern may be needed as part of evidence against the perpetrator, or legal proceedings may require the individual to appear as a witness. Furthermore, individuals should be aware that by reporting matters anonymously, it will be more difficult for the Company to investigate them, protect the individual and provide feedback.

5. Malicious Allegations

5.1 Just as the Company will seek to protect those who raise concerns in good faith, it will also protect those against whom claims are made. The Company will take disciplinary action, which may include summary dismissal, against any individual who raises a concern maliciously, knowing it to be untrue.

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6. Raising a concern: The Procedure

6.1 General principles

- a) The Company encourages individuals to raise the matter when it is just a concern, as long as they have a reasonable belief in the wrongdoing. Acting sooner, rather than later can avoid any further potential damage.
- b) It is recognised that in some circumstances it may be inappropriate to go through the two stages detailed below either because of the nature of the employment relationship, e.g. the complaint relates to the worker's immediate superior, or where the matter is of sufficient gravity or urgency. In these circumstances, a worker may start the process at Stage 3.
- c) The Company recognises that setting out a concern in writing is not easy, especially for those workers whose first language is not English, or who have difficulty expressing themselves on paper. In these circumstances, the individual should seek help from a work colleague or trade union representative.
- d) Individuals are encouraged to put their name to their allegation. Concerns expressed anonymously are much less powerful but will be considered by the Company in the context of: (i) the seriousness of the issues raised; (ii) the credibility of the concern; and (iii) the likelihood of confirming the allegation.
- e) If there could be any language difficulties, (e.g. a non-English speaking employee or a deaf employee) at a meeting, the Company will arrange for an interpreter, so the employee is not disadvantaged.
- f) A worker making a complaint will be allowed reasonable time, with pay, to seek advice for any meeting which forms part of the process and to be accompanied by a work colleague, a trade union representative or a works committee representative.

6.2 Stage 1 (informal step):

- 6.2.1 If an individual has a concern about malpractice, he/she should wherever possible and appropriate, seek to resolve the concern informally with their line manager. This may be done orally or in writing.
- 6.2.2 An individual should specify from the outset if they wish the matter to be treated in confidence so that the Company can make appropriate arrangements. If the individual has a personal interest in the matter, this should also be declared at the outset.

6.3 Stage 2 (internal - formal step):

- 6.3.1 If an individual feels that they are unable to raise a particular matter with their line manager, for whatever reason, they should raise the matter with either:
 - a) A Senior Manager or
 - b) The HR Manager

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6.3.2 Once an individual has reported their concern, the Company will look into it to assess what action should be taken. This may involve an internal inquiry or a more formal investigation. In any case, within ten working days, the Company will write to the individual with:

- a) Acknowledgement that the concern has been received;
- b) Outline of the concern that has been reported;
- c) Indication of how the concern will be dealt with;
- d) Indication of any initial enquires that have been made;
- e) Notification of any further investigations that will take place and if no further investigations will take place, an explanation of why this is the case; and
- f) Contact details of the person dealing with the individual's concern.

6.3.3 Where appropriate the matters raised may be:

- a) Investigated by management, appropriate external advisors or via a disciplinary process.
- b) Referred to an external independent auditor or enquiry.
- c) Referred to the police.

6.3.4 Whilst the purpose of this policy is to enable the Company to investigate malpractice and take appropriate steps to deal with it, and provide feedback on the action taken, we will not be able to divulge the precise details if this infringes a duty of confidence owed by the Company to someone else, or if the Company is prevented from doing so for legal, or commercially sensitive reasons.

6.3.5 This policy provides individuals with the opportunity and protection they need to raise concerns internally and we would expect the majority of concerns to be handled in this way.

6.3.6 Where concerns have been raised with a Senior Manager or the HR Manager these should be referred by such person to the Group Company Secretary who will consider the concerns raised with the Group Finance Director and Head of Internal Audit and report to the audit committee and/or the board of directors of the Company as appropriate.

6.4 Stage 3 (external – formal step):

6.4.1 However, if an individual feels that they cannot raise their concerns in the above way or, if they are not satisfied after following those procedures or, in exceptional circumstances, then they could raise the matter externally by contacting **Safecall**, which is a secure and confidential route, either by telephoning or via the internet. These details can be accessed by all employees via the internal SharePoint and on noticeboards.

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- 6.4.2 Any allegations of malpractice by management will always be reviewed by a senior manager independent of the business division to which the allegation relates. All allegations and investigation conclusions are reported to the Audit Committee and if necessary, to the Cranwick plc Board.

Where an individual has a specific concern relating to a named retailer's products or services, the retailer will be notified by Cranwick, as soon as possible.

7. Independent Confidential Advice

- 7.1 If an individual is unsure whether or how to raise a concern or wants independent advice at any stage, they may contact **Safecall** who are independent to Cranwick and who will provide free and confidential advice on how to raise a concern about serious malpractice at work.
- 7.2 The **Safecall** service is tested every six months, and all employees are reminded of its existence on a six-monthly basis.

8. Keeping Records

- 8.1 The Company recognises that it is important, and in the interests of both the employer and the individual, to ensure written records are maintained from the point when any issue is raised at any stage above and that these will be treated as confidential and kept in accordance with the Data Protection Act 1998.

Remember, malpractice affects everyone and is unacceptable.

We have produced this policy to help you to help us.

Keep our business ethical and secure!

9. Other relevant Group Policies

- 9.1 The following Additional Group Policies contain additional commitments which support the delivery and content of the Groups Whistleblowing Policy:

- **Corporate Responsibility Policy**
- **Group Equal Opportunities, Harassment & Dignity at Work Policy**
- **Anti – Slavery and Human Trafficking statement**

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For CranSwick plc:



Adam Couch
Chief Executive
1st April 2021

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