

## WHISTLEBLOWING POLICY

### 1. Purpose

This Whistleblowing Policy outlines the process and protection in place for employees, contractors, and workers to report concerns about unethical, illegal, or improper conduct within the organisation. The company is committed to maintaining the highest standards of integrity, transparency, and accountability.

### 2. Scope

This policy applies to all employees, officers, contractors, suppliers, and other third parties connected with the organisation. Reports may relate to, but are not limited to:

- **Criminal activity:** Examples include fraud, theft, corruption, bribery, or any other illegal acts.
- **Breach of legal or regulatory requirements:** Non-compliance with laws, regulations, or industry standards that the organisation is obligated to follow.
- **Health and safety risks:** Unsafe work practices, endangerment of employee or public safety, or failure to comply with health and safety regulations.
- **Environmental damage:** Actions or omissions that result in pollution, harm to natural habitats, or non-compliance with environmental laws.
- **Cover-ups:** Attempts to conceal or suppress evidence of wrongdoing.
- **Sexual harassment:** Unwanted behaviour of a sexual nature.

In order to qualify for a whistleblowing disclosure, it may be reasonable for you to believe that your disclosure fits into one of the above categories and it is in the public interest. To be in the public interest it also has to affect others (ACAS).

However, not all concerns fall under the scope of whistleblowing. The following are examples of what is **not** typically covered under this policy:

- **Personal grievances:** Matters such as disputes between colleagues, dissatisfaction with management decisions, or concerns about pay and benefits. These should be addressed through the grievance procedure.
- **Issues already being addressed:** Concerns that have already been reported and are under investigation unless new evidence or information arises.
- **Matters of personal opinion:** Differences in opinion or judgment about management styles, strategic decisions, or workplace culture that do not involve unethical or illegal behaviour.

If you are unsure whether your concern qualifies as a whistleblowing disclosure, you are encouraged to seek guidance from the Whistleblowing Officer or another designated contact within the organisation.

## 3. Reporting Concerns

### 3.1 Internal Reporting Channels

- **Supervisor or Manager:** Employees are encouraged to report concerns to their immediate supervisor or manager.
- **Whistleblowing Officer:** If employees are uncomfortable reporting to their supervisor or manager, they may contact the designated Whistleblowing Officer via email at [whistleblowing@holdsworthfoods.co.uk](mailto:whistleblowing@holdsworthfoods.co.uk). Any external party wishing to make a disclosure should use this email address.

**3.2 External Reporting** If internal reporting is not appropriate or effective, concerns may be raised with external bodies such as a regulatory authority.

## 4. Protection and Confidentiality

**4.1 Protection Against Retaliation** The company will not accept retaliation against anyone who raises a concern in good faith. Retaliation includes, but is not limited to, dismissal, demotion, harassment, or any form of discrimination.

**4.2 Confidentiality** The company will make every effort to protect the identity of whistleblowers. Information will only be disclosed on a need-to-know basis and in compliance with legal obligations.

**4.3 False Reporting** Reports made maliciously or with the intent to harm others may result in disciplinary action, up to and including termination of employment.

## 5. Investigation Process

**5.1 Acknowledgment** Upon receiving a report, the Whistleblowing Officer will acknowledge receipt within five business days.

**5.2 Assessment and Investigation** All reports will be assessed, and if necessary, a formal investigation will be initiated. Investigations will be conducted promptly, thoroughly, and impartially.

**5.3 Outcome and Resolution** Once the investigation is complete, appropriate action will be taken based on the findings. Whistleblowers will be informed of the outcome, subject to confidentiality and legal considerations.

## 6. Responsibilities

- **Employees:** Report concerns in good faith and cooperate during investigations.
- **Management:** Support whistleblowers, ensure concerns are addressed promptly, and maintain confidentiality.
- **Whistleblowing Officer:** Oversee the process, ensure investigations are conducted impartially, and provide regular updates to the leadership team.

## 7. Communication and Training

The company will ensure that all employees and relevant stakeholders are aware of this policy. Regular training and communication will be provided to reinforce the importance of ethical conduct and the whistleblowing process.

## 8. Support

We understand and appreciate that raising a Whistleblowing disclosure can increase feelings of anxiety. Employees are reminded of the Employee Assistance Programme which is currently provided via BUPA. This offers a confidential advice line and up to six sessions of counselling. They can be contacted on 0330 1230124.

## 8. Review and Amendments

This policy will be reviewed annually and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

## 9. Contact Information

- Whistleblowing Officer: Gary Adnitt at [whistleblowing@holdsworthfoods.co.uk](mailto:whistleblowing@holdsworthfoods.co.uk)