

## About this Policy

The Compleat Food Group is committed to maintaining the highest standards of ethical conduct and integrity in all that it does. To support this commitment, we have developed our **Speak Up** and Whistleblowing Policy to encourage our employees, contractors, vendors, and other stakeholders to report any issue or concern about how the business operates.

We encourage everyone to take **PRIDE** in their work and ensure that quality is at the heart of everything we do. **INTEGRITY** is important to us, and we demonstrate this by doing the right thing even when no one is looking. In the context of our work this means:

- Putting safety first, always.
- Ensuring food safety, legality and integrity is maintained.
- Delivering **QUALITY** products to our customers.
- We all have a duty to demonstrate great leadership and to ensure that nobody is harassed or bullied in any form and can raise the alarm if we see anything of concern.
- We do not tolerate bullying or harassment in our workplace or work-related events outside the workplace or by the use of social media.
- Ensuring our conduct is ethical and legal in all that we do. We do not tolerate any criminal activity, breach of legal regulations, endangering somebody's health or safety, environmental damage and any attempt by any person to conceal any such matters.

When we see an issue or malpractice, we expect our teams to have the **COURAGE** to challenge this and speak up to the appropriate person in the business. We then expect teams to work at **PACE**, making clear decisions and deliver our commitments on time.

## Objective

The objective of **Speak Up** is to:

- Ensure that everyone in our business feels confident to speak up and trust that we will resolve concerns in a reasonable time-frame.
- Provide an escalation framework if employees do not feel listened to.
- Provide an anonymous way of raising concerns for those who wish to not be identified.
- Make sure that concerns escalated are thoroughly investigated.
- Prevent retaliation against individuals who report concerns in good faith.
- Take time to investigate and understand situations thoroughly to ensure the right decisions are made.

This policy is not a grievance procedure. Any colleague who has a concern about the way they are being treated as an individual at work (as opposed to a concern about malpractice within the workplace) should follow the grievance procedure.

Issue date: Oct 2023	Issue No: 2	Authorised by: Hayley Kingdom
Reason for change: Replacing EE Disclosure Policy & Procedure		Doc Ref: <i>TCFG3.3 Speak up and Whistleblowing Policy</i>

## Speak Up: Internal Escalation Procedure

### Stage 1 Speak Up: to your Manager

We believe that most concerns can be dealt with by speaking to your manager. We expect managers at all levels to listen to all employees that **Speak Up** and raise concerns. We also expect managers to resolve concerns in a reasonable timeframe and keep employees informed of their progress.

### Stage 2 Speak Up: to the Senior Leadership Team (SLT)

We recognise that managers don't always follow up on concerns, or concerns can be seen to take too long to resolve. Sometimes the concerns are about the managers behaviour or actions. Where this is the case the next level of escalation is to **Speak Up** to your site or functional leadership team. If you are factory-based posters are visible across sites of how you can contact the Senior Team of your Site.

There is frequently lots on the improvement list already and the site plan, and things sometimes take a bit of time to change. There are areas of priority however that absolutely must be raised to ensure the leadership teams are aware and we must prioritise activities that protect the health and safety of our team, the food safety of our products and that we do not partake in unethical or illegal activities. If there is a delay in resolving your issues the SLT member will be able to let you know why this is the case.

### Stage 3 Speak Up: to a Director

Where it is felt that the SLT are not being as active in their response as you would have liked the next step is to escalate to a Divisional or Functional Director. Our Directors are here to ensure the processes and systems are followed and that the business prioritise the right actions and considerations in all circumstances. There could be a time where something cannot be fixed immediately, but by taking this matter to a Director through the **Speak Up** process, we expect you to receive feedback on your concerns and for them to see that our business is upholding high standards of ethical governance and promoting behaviours aligned with our business's values.

### Stage 4 Speak Up: to the Executive Board

As a final stage you can email the Executive Board, although it is expected that you have escalated your issue via the previous stages before you do this, our Executive Board will engage in open and transparent communication with colleagues to ensure that the right outcomes are reached when concerns are raised.

### Speak Up: to the HR Team

At any stage, it is always an option for colleagues to **Speak Up** and seek advice from the HR team. Wherever possible the fact that an employee has approached the HR Department will remain anonymous, however if the matter is one that the HR Department must report due to its seriousness or if there is a risk to others, they will inform the employee that they have no choice but to report it whilst still seeking to keep the identity of the discloser anonymous.

### Speak Up: How to

Scan the QR code and complete the form provided.

Or email: [speakup@compleatfood.com](mailto:speakup@compleatfood.com) stating the site and level of escalation.

We will arrange your concern to get to the right person in the business.



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## Whistleblowing: External Reporting Line

We recognise there are times where you identify something so serious that you may not feel comfortable using the internal **Speak Up** process. If this is the case, we ask that you raise your concerns using our externally managed Whistleblowing Hotline. To make an anonymous whistleblowing disclosure, the following steps must be followed:

### Via Phone:

Telephone: 0800 89 0011

- When prompted, please enter the corresponding telephone number specific to The Compleat Food.
- Group: 833 613 0667.
- You will then be transferred to a communication specialist to handle any report.

### Via Internet:

- Visit <https://compleatfoodgroup.ethicspoint.com>

Our externally managed Whistleblowing line supports the most common languages spoken within The Compleat Food Group to ensure clarity of communication and understanding.

## What happens after you raise a concern through the External Reporting Line?

All anonymous allegations are notified directly to our Chief People Officer or their authorised deputy. They will review the allegations and confirm if it should be investigated as a Whistleblowing matter or if it should be dealt with by a more appropriate procedure such as:

- **Grievance Procedure** - Grievances or disputes affecting terms and conditions of employment, working conditions or breaches of employment contracts.
- **Disciplinary or Capability Procedures** - Complaints involving an allegation of misconduct, incapability or the termination of an employee.
- **Equal Opportunities Policy or Grievance Procedure** - Complaints relating to the Company not complying with Equal Opportunity laws.
- **Harassment and Bullying Procedures** - Complaints involving an allegation of harassment or bullying.

If the matter is agreed to be a Whistleblowing matter the Chief People Officer or authorised deputy will promptly initiate an investigation. The investigation will be conducted impartially and with the utmost discretion.

Whistleblowers may be contacted for additional information through the whistleblowing portal.

If the investigation confirms the concerns, appropriate corrective actions will be taken, which may include disciplinary actions, changes in procedures, or reporting to relevant authorities. The use of the portal ensures the anonymity of the person raising the concerns throughout any dialogue.

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### Further Escalation

Although we acknowledge that it is frustrating not to receive feedback or an immediate answer to your concerns, we encourage you explore the **Speak Up** process fully before sharing your concerns to any other organisation (such as our customers or regulatory authorities). We really do want to be able to address matters internally as soon as we can before matters are escalated externally and hope that you will not share externally any concerns you may have without, at the very least, having allowed us to address them internally.

If you wish to talk through your concerns with another party, you might want to contact Protect Advice: an independent charity providing confidential advice on whistleblowing. They can be contacted on 020 3117 2520 or [Protect - Speak up stop harm - Protect - Speak up stop harm \(protect-advice.org.uk\)](https://protect-advice.org.uk).

### Protection from Retaliation

It is important to note that UK Law (The Public Interest Disclosure Act 1998) gives protection to employees who disclose certain types of information about possible wrong doings or malpractice by their employer if they genuinely believe there is a problem.

We strictly prohibit any form of retaliation against individuals who report concerns in good faith. Retaliation may include, but is not limited to, termination, demotion, harassment, or any other adverse employment action. Individuals who believe they have experienced retaliation should report this to the HR department and such claims will be investigated thoroughly. Anyone found to have engaged in retaliation against a whistleblower will be subject to disciplinary action, which may include termination of employment or contractual relationship.

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