



ANNINGTON LIMITED

WHISTLE-BLOWING POLICY

Last updated: March 2016

Table of Contents

<u>1</u>	<u>WHAT IS WHISTLE-BLOWING</u>	<u>3</u>
	1.1 OUR COMMITMENT.....	3
	1.2 WHO DOES THE POLICY APPLY TO	3
<u>2</u>	<u>AIMS OF THE POLICY</u>	<u>4</u>
<u>3</u>	<u>WHAT IS A QUALIFYING DISCLOSURE</u>	<u>5</u>
<u>4</u>	<u>SAFEGUARDS AND VICTIMISATION</u>	<u>6</u>
	4.1 CONFIDENTIALITY.....	6
<u>5</u>	<u>HOW TO RAISE A CONCERN AND WHAT WILL HAPPEN</u>	<u>8</u>

1 What is Whistle-blowing

Whistle-blowing enables employees to raise genuine concerns about work-related incidents of wrong-doing within a company rather than overlooking the problem or 'blowing the whistle' outside.

Employees are often the first to realise that there is something seriously wrong within a company, but they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the company or they fear they could be damaging their own career prospects.

1.1 Our Commitment

Annington Limited ("Annington") is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees and others that we deal with who, in good faith, have any genuine cause for concern about any aspect of Annington's work, to come forward and voice those concerns.

1.2 Who does the Policy Apply to

The policy applies to all employees (including those designated as casual hours, temporary or agency) and contractors. It also covers authorised volunteers or those on work experience and those who provide services to our organisation.

2 Aims of the Policy

The main purpose of the policy is to provide you with ready access to a safe and effective means of reporting matters that cause you genuine concern regarding Annington and/or its employees (no matter how serious), in the full knowledge that the report will be dealt with in the strictest confidence and you will be protected against any detriment.

The main aims of the policy are to:

- Provide avenues for you to raise concerns in confidence and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation, if you have a reasonable belief that you have made a disclosure in good faith.

3 What is a Qualifying Disclosure

- Conduct which is an offence or a breach of law.
- Disclosures related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The un-authorised use of company funds or assets.
- Possible fraud and corruption.
- Discrimination or victimisation of employees.
- Other unethical conduct.
- Deliberate concealment of information relating to the above matters
- Concerns related to slavery or trafficking

Other procedures are available to employees e.g. the Grievance Procedure which relates to complaints about your own employment. This policy also does not replace other corporate reporting procedures, e.g. the Annington Anti-Money Laundering Policy.

4 Safeguards and Victimisation

The law provides special protection for workers who make what are known as “public interest disclosures”. The Public Interest Disclosure Act came into force in 1999 and has since been amended by other legislation, including the Enterprise and Regulatory Reform Act 2013. It encourages people to raise concerns about malpractice in the workplace. The Act applies to all organisations.

A qualifying disclosure, also referred to as ‘blowing the whistle’, will receive protection under the Act if it is made ‘in the public interest’. An individual must also believe that what they are reporting is substantially true and:

- must **not** act maliciously or make false allegations; and
- must **not** seek any personal gain from their disclosure

Annington recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to Annington as your employer. However, Annington asks you to express only concerns or suspicions that are genuine and that you act at all times in good faith.

Annington will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

We will support anyone who makes a confidential disclosure and protect them from reprisals or victimisation. If you come forward with a concern, you can be confident that your employment will in no way be affected. This applies equally if anyone comes forward in good faith with a concern which turns out later not to have been justified.

If anyone tries to discourage you from coming forward to express a concern this will not be tolerated by Annington and, in the same way, anyone who criticises, or victimises, you, after a concern has been expressed will be dealt with under the disciplinary process.

4.1 Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

This policy encourages you however to put your name to your concern whenever possible.

Please note that employees must:

- Disclose the information in good faith.
- Believe it to be substantially true.

-
- Not act maliciously or make false allegations.
 - Not seek any personal gain.

Any disclosures made in bad faith may result in disciplinary action being taken.

5 How to Raise a Concern and What Will Happen

As a first step, you should normally raise concerns either verbally or in writing with your immediate manager. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that a manager is involved, you should approach their Director. If you suspect financial or accounting irregularities then contact the Chief Financial Officer or alternatively the Chief Executive Officer.

You may, however, in the first instance wish to seek advice or raise your concerns confidentially NGA Human Resources, the contact details for the NGA Human Resources advice line are tel: 0845 299 0243 or hr.adviceline@ngahr.com

When reporting a concern you should attempt to identify the specific concerns, when and where something has occurred, who was involved, whether there was an on-going problem or a need for immediate action, and any other information you think is relevant. You are not necessarily expected to have all the answers, but in general, the more specific the information you can provide, the better. Let Annington look into the matter to determine if there is a concern and do not try to conduct an investigation yourself.

It is acknowledged that it is never easy to report a concern, particularly one which may relate to an unlawful act. However, you are encouraged to come forward with any concerns at the earliest opportunity, so that matters can be dealt with promptly and effectively, before problems get out of hand.

As a result of your disclosure in this matter the investigating officer appointed by the Annington board of directors and NGA Human Resources will investigate the matter and report to the Annington board of directors and progress will be reported to you by NGA Human Resources. If it is discovered a wrong-doing has occurred the appropriate action will be taken.