

Speaking Up Code (Whistleblowing Policy)

1. Speaking up

As a business/organisation we are committed to operating in an ethical and principled way. We expect our employees and other stakeholders to do the same.

The ‘Speaking Up’ code has been put in place to assist employees to support us in our aims by providing a safe, independent route by which you may raise any concerns you have about issues that are not in accordance with our stated aims. To enable this scheme to work we look to our employees to bring matters of concern about possible wrong, dishonest or illegal activity to the appropriate individual within the organisation and it is to this end that the Speaking Up code has been designed to help you in your role.

2. Issues that you may wish to report

The Speaking Up code provides an avenue to report instances of wrong, dishonest or illegal activity. This might include waste or losses, error, mismanagement or dishonesty that may harm individuals or our organisation. This may relate to people issues and/or business issues and it could involve stakeholders.

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation;
- Offering, taking or soliciting bribes;
- Dangers to Health & Safety or the Environment;
- Criminal activity;
- Improper conduct or unethical behaviour;
- A breach in authenticity of product or food safety regulations
- Supplying food unfit for consumption;
- Attempts to conceal any of these.

We recognise that you may observe some behaviour and may be unsure whether it is inside acceptable boundaries or not, and whether it is appropriate for you to use the Speak Up code. If you are unsure, you can call the HR Manager or the Factory Manager in confidence for advice.

Before making a report to the appropriate individual you may find it helpful to note down:

- The nature of your concern or issue to be reported.
- Reason for believing that what you are reporting is an issue.
- Full name(s) of those involved. **DO NOT APPROACH OR ACCUSE ANY INDIVIDUALS DIRECTLY.**
- Times and dates when it may have happened.
- Details of the location concerning the issue.
- Details of any evidence.

Ref No.	Approved by	Issue Date	Revision No.	Page No.
POLICY/02	Ross McMahon / Angela Milns	24/04/2023	4	1 of 3

- Has any action already been taken by anyone?
- Details of any witnesses.

3. Anonymous allegations

Under the Speaking Up code you are encouraged to identify yourself. Anonymity means that you will not be able to receive feedback and it is also likely to make investigating a concern more difficult. We will, however, consider anonymous reports according to:

- The seriousness of the issues raised
- The credibility of the concern
- How likely it is that the concern can be confirmed from attributable sources.

Do not use the Speaking Up code for:

- Personal grievances
- Untrue allegations. We encourage you to speak up in good faith but we do not condone malicious or vexatious allegations. Disciplinary action may be considered and implemented against those who seek to abuse the code.

4. Privacy

We will respect your privacy if you raise a concern in good faith. There may be instances where it becomes necessary to reveal the source of information and a statement may be required as part of the evidence (for example, where an act of wrongdoing has been proven and a statement is required for disciplinary proceedings or to mount a prosecution. In such an event we will support you throughout the process.

5. Harassment or victimisation

You can be confident that we will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith.

6. Who should I contact?

Everyone in our business, including members of the senior management team, is subject to the same standards and anyone who has concerns or issues relating to the CHIEF EXECUTIVE OFFICER can speak in confidence to the HR Manager.

We encourage you to raise your concerns internally in the first instance as we provide a safe, independent route for you to raise your concerns within Kendal Nutricare Ltd.

Ref No.	Approved by	Issue Date	Revision No.	Page No.
POLICY/02	Ross McMahon / Angela Milns	24/04/2023	4	2 of 3

Contact numbers:

HR Manager: Angela Milns: 01539 877 137
Factory Manager: Simon Evans: 07736572622
Trade Union Representative: Jason Donohue: 07900987004
Chief Executive Officer: Ross McMahon: 07983 550 955

As a last resort, if you feel you need outside advice, you may consider contacting the following external agencies which are able to provide support:

- Public Concern at Work (in the UK) is a charity that provides a free and strictly confidential legal helpline to anyone in the UK concerned about malpractice which threatens the public interest. There is much helpful information on their website: <http://www.pcaw.co.uk/>. They also operate a helpline on 020 3117 2520.
- You may also raise suspicions of wrongdoing directly with the police.

If you seek advice outside Kendal Nutricare Ltd, you are reminded that you need to ensure that you do not disclose confidential information or that your disclosure would be protected by privilege. This can be checked with Public Concern at Work who will also advise on ways to proceed.

It is a condition of working for Kendal Nutricare Ltd that you do not speak or write to representatives of the press, TV, radio, or to any other third party about concerns and issues without the express authority of the Chief Executive Officer. Care must be taken to ensure that nothing is done that could give rise to legal action (e. g for slander or libel) or damage the Kendal Nutricare reputation.

7. Kendal Nutricare Responsibilities

- All issues raised will be dealt with appropriately, consistently, fairly and professionally.
- Investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.
- Feedback will be provided in an appropriate manner, or if possible to employees who raise issues.
- An electronic/paper trail will be kept for all issues raised.

If you are not satisfied that your concern is being properly dealt with by the investigating officer, you have the right to raise it in confidence with one of the designated persons in Section 6.

Ref No.	Approved by	Issue Date	Revision No.	Page No.
POLICY/02	Ross McMahon / Angela Milns	24/04/2023	4	3 of 3