

Speaking Up / Whistleblowing Policy

What is Whistleblowing?

Whistleblowing occurs when a worker raises a concern or discloses information which relates to wrongdoing, illegal practices or unethical conduct which has come to their attention through work.

Our Speaking Up / Whistleblowing policy is intended to encourage and enable workers to raise concerns within our workplace rather than overlooking a problem or raising externally. Under this policy a worker is entitled to raise concerns or disclose information without fear of penalisation or threat of less favourable treatment, discrimination, or disadvantage. Wrongdoing or malpractice could be improper, illegal, or negligent behaviour by anyone in the workplace. Such concerns could include:

- Financial malpractice or fraud.
- Failure to comply with a legal obligation.
- Endangerment of health and safety.
- Damage to the environment.
- Criminal activity.
- Improper conduct or unethical behaviour.
- Attempts to conceal or destroy evidence relating to a concern.

Our Commitment

BWG Foods is committed to maintaining an open culture with the highest standards of honesty and accountability where workers can report any concerns regarding malpractice or unauthorised behaviour to the Company without fear of reprisal, and in confidence.

Who does the policy apply to?

This policy applies to workers. Workers are defined in the legislation as persons who are or were:

- Employees
- Agency Workers
- Contractors
- Trainees
- Volunteers
- Board Members
- Shareholders
- Job Applicants

What types of concerns can be raised?

A concern or disclosure should relate to a relevant wrongdoing such as possible fraud, crime, danger or failure to comply with any legal obligation which has come to your attention in connection with your employment and about which you have a reasonable belief of wrongdoing.

What types of concerns should not be raised under this Procedure?

A personal concern, for example a grievance around your own contract of employment would not be regarded as a whistleblowing concern and would be more appropriately processed through our Grievance Procedure.

Safeguards and Penalisation

A worker who makes a disclosure and has a reasonable belief of wrongdoing will not be penalised by the Company, even if the concerns or disclosure turn out to be unfounded.

Penalisation includes suspension/dismissal, disciplinary action, demotion, discrimination, threats or other unfavourable treatment arising from raising a concern or making a disclosure on the basis of reasonable belief for doing so. If you believe that you are being subjected to penalisation as a result of making a disclosure under this procedure, you should inform the HR Manager or any senior manager of the Company.

Workers who penalise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

Workers are not expected to prove the truth of an allegation. However, they must have a reasonable belief that there are grounds for their concern. It should be noted that appropriate disciplinary action up to and including dismissal may be taken against any worker who is found to have raised a concern or raised a disclosure with malicious intent.

Confidentiality

The Company is committed to protecting the identity of the worker raising a concern and ensures that relevant disclosures are treated in confidence. The focus will be on the wrongdoing rather than the person making the disclosure. However, there are circumstances, as outlined in the Act, where confidentiality cannot be maintained particularly in a situation where the worker is participating in an investigation into the matter being disclosed. Should such a situation arise, we will make every effort to inform the worker that his/her identity may be disclosed.

Raising a Concern Anonymously

A concern may be raised anonymously. However, on a practical level it may be difficult to investigate such a concern. Workers are encouraged to put their name to any disclosures they make, with our assurance of confidentiality where possible, in order to facilitate appropriate follow-up. This will make it easier for us to assess the disclosure and take appropriate action including an investigation if necessary.

Raising a Concern to the Company

Who should you raise your concern with?

The HR Department are the prescribed function within the Company who will review all concerns received. Once reviewed the HR Department may appoint an impartial investigation team who will investigate all concerns in a thorough, fair and confidential manner.

However, workers whose concerns relate to the HR Department may in this instance raise their concerns with the office of the CEO.

How to raise a concern

Concerns may be raised verbally or in writing. Should you raise a concern verbally we will keep a written record of our conversation a copy of which will be provided to you. Should you wish to raise your concern verbally please contact 086 0239610.

Should you raise a concern in writing we would ask you to give the background and history of the concern, giving relevant details, in so far as is possible, such as dates, sequence of events and description of circumstances. To submit a concern in writing please forward to disclosures@bwg.ie

If your concern relates to the HR Department and you need to raise your concerns with the office of the CEO please contact 014090300, ask to be directed to the office of the CEO where you will be advised on how to proceed with raising your concern.

The earlier you express the concern the easier it will be for us to deal with the matter quickly.

Having raised your concern with us, we will arrange a meeting to discuss the matter with you on a strictly confidential basis. We will need to clarify at this point if the concern is appropriate to this procedure or is a matter more appropriate to our other procedures, for example our Grievance or Dignity in the Workplace procedures. You can choose whether or not you want to be accompanied by a colleague or a trade union representative.

How we will deal with your disclosure

Any disclosures brought to the attention of the Company will be treated in a confidential and sensitive manner.

When making a disclosure regarding suspected malpractice or unauthorised behaviour, workers must

- (a) make the disclosure in good faith (which means with honest intent and without malice).
- (b) reasonably believe that the information is true and provide specific information available (in the absence of evidence, but on the basis that you suspect that unauthorised behaviour is being practiced, you are encouraged to bring this matter to the attention Line Management).
- (c) reasonably believe you are making the disclosure to the right 'prescribed person' as outlined in this policy.

Having obtained a report from a worker, an impartial investigation team may be appointed to explore the matter in a thorough, fair and confidential manner if appropriate.

In the event a worker does not wish to have their identity disclosed, a team may be assigned to observe practices within a branch or department to ensure branch operations and/or activities are compliant. In this event, it may be necessary to conduct an investigation from information arising from these observations. At this point, all workers are required to co-operate in full with the investigation, including any individual who disclosed information anonymously.

Disclosures may, in the light of the seriousness of the matters raised, be referred immediately to the appropriate authorities. Likewise, if urgent action is required (for example to remove a health and safety hazard), this action will be taken.

It is important to us that you feel assured that a disclosure made by you under this policy is taken seriously and that you are kept informed of steps being taken by us in response your disclosure. In this regard we undertake to communicate with you as follows:

1. We will acknowledge receipt of your disclosure within seven days and arrange to meet with you as outlined above.
2. We will provide feedback to the worker who made the disclosure within a reasonable period, but no more than 3 months from the date of the acknowledgement of receipt of the protected disclosure.
3. We will inform you of how we propose to investigate the matter and keep you informed of actions, where possible, in that regard including the outcome of any investigation, and should it be the case, why no further investigation will take place. However, it is important to note that sometimes the need for confidentiality and legal considerations may prevent us from giving you specific details of an investigation. The worker additionally may request in writing that the Company provide updates every 3 months until such a time as the matter is closed.
4. We will communicate in writing the final outcome of any investigation triggered by the report.

Following a thorough investigation of disclosure of malpractice or unauthorised behaviour, where it is found further action is unwarranted, the disclosing worker will not be subject to any disciplinary action where it is considered that their concerns have been voiced out of genuine goodwill for the purpose of protecting the Company. However, if a worker makes malicious allegations, and particularly if he or she persists with making them, disciplinary action up to and including dismissal may be taken against that individual.

It is in the best interest of BWG Foods for workers to voice their concerns to the Company if they are in any way concerned that Company policies are not being adhered to. All workers have a responsibility to uphold Company policies and as such, workers are encouraged to bring to our attention, any concerns regarding possible or definite malpractice or unauthorised behaviour within the Company.

Inferences may be taken from any worker or manager who was aware of malpractice or wrongdoing but failed to bring it to the attention of the Management and/or escalate in line with this policy. Such behaviour may be considered gross misconduct and warrant disciplinary action up to and including dismissal.

External Reporting

Following reporting a concern a worker believes that the Company's response has not been effective or if they do not wish to raise the matter internally there are alternative avenues for the concern to be reported to a prescribed person, a protected disclosures commissioner, a public disclosure or any other method as outlined in the relevant legislation.

This policy will be updated and communicated in line with associated legislation.