



## Hilton Food Group plc Whistle-blowing Policy

The following policy applies to all employees of Hilton Food Group plc and its subsidiary companies (the "Group"). It also applies to all other relevant people i.e. any agency worker or contractor who we engage or who a supplier or other business partner engages.

The Board of Hilton Food Group plc is committed to a free and open culture in dealings between its officers, employees, customers, suppliers and all people with whom the Group engages in business relations. Hilton Food Group Plc seeks to conduct its business honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. Examples of the kind of misconduct we mean are below.

The Board recognises that effective and honest communication is essential to maintain our business values and to ensure that instances of business malpractice are detected and dealt with.

### **Purpose**

The purpose of this policy is to encourage everyone, whether they are full-time or part-time employees, agency staff, agents, contractors, suppliers or customers of the Group, to report any business misconduct without worrying about risk to themselves or their jobs.

### **Policy**

This policy will apply in cases where you genuinely believe or suspect that business misconduct is occurring, has occurred or may occur within the Hilton Food Group.

Whistleblowing is the disclosure of information which relates to suspected business misconduct, wrongdoing or dangers at work. This may include:

- a criminal offence has been committed, is being committed or is likely to be committed, including fraud or pilfering; non-compliance with legal obligations or regulatory requirements;
- the use of deception to obtain an unjust or illegal financial advantage for the business unit or personally;
- a fundamental breach of internal control including food safety and quality;
- an accounting irregularity;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- a danger has been or is likely to be caused to the health and safety of any person; or
- a deliberate cover-up of any of the above.

This policy is separate from the grievance procedure as described in your employee handbook and does not form part of your contract of employment. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the grievance procedure.

## **Procedure**

We would rather you raise a matter at an early stage. We do not need you to provide absolute proof, although you should have genuine reasons for your concern.

You should, first, raise the matter with your line manager or, if you do not feel this is appropriate, with your senior manager. Examples where it may be best to go to your senior manager include where your concern involves your line manager.

If you have raised the matter and are still concerned or if you feel unable to talk to your line manager or your senior manager then you should contact Mr Neil George at Hilton Food Group plc, 2-8 The Interchange, Latham Road, Huntingdon, Cambridgeshire PE29 6YE, UK; or by telephone: **+44 (0) 845 844 4761**; or email: **Neil.George@hfgplc.com** who will treat the matter in confidence. All instances of whistle-blowing to Mr George will be reported to the Chairman of the Audit Committee. If you consider reporting to Mr George would be inappropriate you can contact any Board member.

We can use interpreters or translators as appropriate.

## **Investigation**

Once an allegation of business misconduct or wrongdoing or dangers at work is made Mr George will, if appropriate, agree an investigation plan with the Chairman of the Audit Committee.

Once the investigation is complete it may be reviewed by the Audit Committee and you will be advised of the results of the investigation as well as any corrective actions which are being taken.

The Group is committed to running its operations without misconduct and expects its staff and other stakeholders to share this objective. However, the Group also recognises that whistle-blowing is a potentially sensitive issue. If you believe that you are being penalised in any way for whistle-blowing or if you do not consider that you have had a satisfactory response to your disclosure, you should write to the Chairman of the Audit Committee setting out the facts.

## **Confidentiality**

We hope that staff will feel able to voice whistle-blowing concerns openly under this policy. If you choose to raise your concerns confidentially, every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation, you will be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may however be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity, such as if there is disciplinary or legal action. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is possible, however, that your role as the whistleblower could still become apparent to third parties during the course of the investigation.

Any whistle-blowing employee or worker is protected against adverse employment actions (i.e. dismissal, demotion, suspension, harassment or other forms of discrimination) for making a report of concerns they reasonably believe to have occurred or be likely to occur, and to be in the public interest. A whistle-blowing employee is also protected even if the allegations prove to be incorrect or unsubstantiated, where it is believed the information and any allegation in it are true.

## **Disciplinary Action**

If any allegation of business malpractice is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) in accordance with the Group's disciplinary procedure, up to and including termination of employment. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result.

Furthermore, any act of retaliation or victimisation against a whistle-blower employee will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

The misuse of the whistle-blowing policy will result in disciplinary action against a person who acts maliciously in accordance with the Group's relevant local disciplinary procedure, up to and including termination of the relationship.