

WHISTLEBLOWING POLICY



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1. ABOUT

Saputo Dairy UK is committed to the highest standards of openness, honesty and accountability.

An important aspect of accountability and transparency is a mechanism to enable all colleagues to voice concerns in a responsible and effective manner. The policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

Saputo Dairy UK expects all colleagues to maintain high standards. All colleagues hold a duty of confidentiality relating to the Saputo Dairy UK Group's commercial and business affairs and its trade secrets. Nevertheless, where a colleague discovers information which they believe shows serious malpractice or wrongdoing within the Company then this information should be disclosed internally without fear of reprisal.

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to colleagues against being dismissed or penalised as a result of disclosing certain serious concerns. Saputo Dairy UK has endorsed the provisions set out below so as to ensure that no colleague should feel at a disadvantage in raising legitimate concerns.

Although this policy is specifically designed to protect Saputo Dairy UK colleagues, the Saputo Dairy UK whistleblowing number is also available for third parties, including suppliers and customers, to report any genuine concerns about any suspected wrong doing or danger.

2. DEFINITION

Whistleblowing is solely about encouraging and enabling Saputo Dairy UK colleagues to raise serious concerns within Saputo Dairy UK rather than overlooking a problem or 'blowing the whistle' outside the company.

Whistleblowing occurs when a colleague raises concerns or worries about wrongdoing or malpractice within the workplace. This may include:

- Criminal offences;
- Failure to comply with legal obligations;
- Miscarriages of justice;
- Danger to the health and safety;
- Damage to the environment;
- Food safety, integrity, quality and legality;
- Bribery;

- Facilitating tax evasion;
- Financial fraud or mismanagement;
- Conduct likely to damage Saputo Dairy UK's reputation or financial wellbeing;
- A deliberate attempt to hide or cover up any of the above.

The colleague must genuinely believe that the disclosure is substantially true. There are some disclosures however which will not be protected. This could occur if a colleague broke the law through making a disclosure.

3. PURPOSE

It should be emphasised that this policy is intended to assist colleagues who believe they have discovered malpractice or wrongdoing. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

This policy should not be used for complaints relating to a colleague's own personal circumstances, such as the way they have been treated at work. In those cases the colleague should use the Grievance Procedure.

With the "whistleblowing" procedures in place, it is reasonable to expect colleagues to use them rather than air their complaints outside Saputo Dairy UK.

4. SCOPE

The Saputo Dairy UK is committed to the highest possible standards of openness, integrity and accountability. In line with that commitment we expect colleagues, and others that we deal with, who have serious concerns about any aspect of Saputo Dairy UKs business to come forward and voice those concerns.

This policy is designed to enable colleagues of Saputo Dairy UK to raise concerns internally and at a high level and to disclose information which the colleague believes shows malpractice or impropriety.

This policy is intended to cover concerns such as those listed under 'Definition of Whistleblowing' above, which are in the public interest. Concerns may be investigated separately in the first instance but may then lead to the use of other procedures e.g. disciplinary.

5. SAFEGUARDS

5.1 PROTECTION

Saputo Dairy UK recognises that the decision to report a concern can be a difficult one to make. However, this policy is designed to offer protection to those colleagues of the Company who disclose concerns provided the disclosure is based on a genuine concern of malpractice or impropriety and if the disclosure is made to an appropriate person (see 'Procedure' below).

Saputo Dairy UK will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the colleague when they raise a genuine concern which is in the public interest under this policy.

5.2 CONFIDENTIALITY

We hope that all colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if a colleague wants to raise their concern confidentially, Saputo Dairy UK will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know the whistleblower's identity, this will be discussed with the colleague in question.

5.3 ANNONYMOUS ALLEGATIONS

This policy encourages colleagues to put their name to any disclosures they make. Concerns expressed anonymously are much less credible and proper investigation may be more difficult or impossible if further information cannot be obtained from the whistleblower.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the Whistleblowing Officers listed under 'Procedure' below and appropriate measures can then be taken to preserve confidentiality.

5.4 UNTRUE ALLEGATIONS

If a colleague makes an allegation based on a genuine concern which is not confirmed by subsequent investigation, no action will be taken against that colleague. In making a disclosure the colleague should exercise due care to ensure the accuracy of the information. If, however, a colleague makes malicious or vexatious allegations, and particularly if they persist with making them, disciplinary action may be taken against that colleague.

6. PROCEDURE TO RAISE A CONCERN

In the first instance, a colleague should raise any concerns with their line manager, whether in person or in writing. It is hoped that in most cases the line manager will be able to agree a way of resolving the concern quickly and effectively, although in some cases the line manager may refer the matter to a Whistleblowing Officer.

However, where the matter is more serious, or the colleague feels the line manager has not addressed the concern, or the colleague would prefer not to raise it with the line manager for any reason, then the colleague should proceed straight to stage 2.

Where a colleague does not feel able to raise their concern as set out under stage one, they should call the whistleblowing number: 01372 472198 and leave a message explaining the nature of their concern. As noted above, Saputo Dairy UK hope colleagues will feel able to leave their contact information so further information can be sought (in confidence if necessary). The message will be taken by an appropriate person and will be passed to one of the following "Whistleblowing Officers":

- Group HR Director;
- Company Secretary;
- Technical and Compliance Director.

Where a concern is raised under stage 2, the Whistleblowing Officer will appoint an appropriate manager to be the 'investigating officer', and to investigate the issue and make any necessary enquiries in accordance with the Investigating Procedure outlined below. All records of assessment, investigation and actions taken will be fully documented.

7. INVESTIGATING PROCEDURE

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained;
- The investigating officer should inform the colleague(s) against whom the complaint is made as soon as is practically possible. The colleague(s) will be informed of their right to be accompanied by a trade union or other representative at this meeting and any future interview or hearings held under the provision of these procedures;
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the President and Chief Operating Officer, as appropriate;
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other colleagues/bodies;
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed

to the President and Chief Operating Officer who will, as appropriate, communicate this to the Saputo Group.

- The President and Chief Operating Officer will decide what action to take. If the complaint is shown to be justified, then they may invoke the disciplinary or other appropriate Company procedures;
- Where the identity of the complainant is known, they should be kept informed of the progress of the investigations and, if appropriate, of the final outcome;

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the President and Chief Operating Officer or one of the Whistleblowing Officers described above.

8. CONCLUSION OF THE PROCEDURE

If, on conclusion, the colleague reasonably believes that the appropriate action has not been taken, he/she can report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- The Financial Conduct Authority (formerly the Financial Services Authority);
- The Office of Fair Trading;
- The Health and Safety Executive;
- The Food Standards Agency;
- The Environment Agency;
- The Director of Public Prosecutions; and
- The Serious Fraud Office.

9. POLICY BREACH

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern which is in the public interest. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Any colleague whose conduct breaches this policy in any way, including threatening or retaliating against a whistleblower in any way, may be subject to disciplinary action in accordance with the Company's disciplinary procedure up to, and including, dismissal.

Saputo Dairy UK reserves the right to use any derogatory information posted on social media or in other communications by a colleague in any potential disciplinary/grievance.

10. VERSION CONTROL

Date (MM/DD/YYYY)	Version	Changes description	Editor
01/12/2014	1	Original document	Robert Willock, Group HR Director
20/10/2018	2	To update the requirements for BRC V8 and update law	S Deane and J Killik
01/10/2019	3	Branding update to Saputo Dairy UK	Kinga James, ER Officer
09/09/20	4	Update following organisational changes	Robert Willock Group HR Director

This policy has been agreed in consultation with the relevant Trade Unions and applies to all employees. This policy does not form part of employee's contracts of employment and may be varied by the Company in consultation with the relevant Trade Unions.