# Policy 26 - Whistleblowing

## Introduction

Whistleblowing is an important way to identify and stop wrongdoing at work. We understand that reporting concerns can feel intimidating, but we encourage you to raise any issues internally as soon as possible. All concerns will be taken seriously, and we are committed to listening and responding appropriately.

This policy explains how to raise a whistleblowing concern, and the support and protection available to you.

If your concern is about a personal grievance, such as bullying, harassment, or a breach of your contract, and is not in the public interest, it should be raised through our separate grievance procedure. If you are unsure which process to follow, contact the HR Manager for guidance.

This policy is not part of your contract of employment and may be updated or withdrawn at any time.

## Scope

This policy applies to all workers employed by the company. Contractors, subcontractors, suppliers, and volunteers are also encouraged to follow these procedures if they have concerns.

## Types of whistleblowing concerns

Whistleblowing concerns involve reporting suspected wrongdoing or the risk of wrongdoing in areas such as:

- Criminal offences
- Breaches of legal obligations
- Miscarriages of justice
- Risks to health and safety
- Environmental damage
- Attempts to conceal any of the above

Under the Company's BRC regulations, employees should also raise any whistleblowing concerns including those relating to:

- product safety, authenticity, quality and legality.

You do not need to prove that wrongdoing has occurred. To be protected under whistleblowing laws, you must reasonably believe that the concern is true, relates to one of the areas above, and is in the public interest.

## Stage 1 – Raising a whistleblowing concern

If you have a genuine concern, you should normally raise it with your line manager. If your concern involves your line manager, or you are uncomfortable speaking to them, you should report it to the HR Manager.

Concerns can be raised in writing or verbally. When raising a concern, it is helpful to provide:

- A description of the suspected wrongdoing
- Names of any individuals involved
- Any action you believe should be taken

In some cases, we may invite you to a meeting to clarify your concerns. You may bring a colleague or trade union representative to this meeting, and the HR Manager may also be present if appropriate.

**Stage 2 - Responding to your whistleblowing concern**

When you raise a whistleblowing concern, the manager who receives it will determine whether an investigation is required. If an investigation is needed, the manager will appoint the most appropriate person to conduct it and will confirm in writing that an investigation is taking place, including the expected timescale for completion.

The depth and duration of the investigation will depend on the nature and complexity of the suspected wrongdoing. During the investigation, the investigator may contact you to clarify details or provide input on any new evidence. You may be asked to attend a meeting, and you are entitled to bring a colleague or trade union representative. The HR Manager may also attend if appropriate.

Once the investigation is complete, you will be informed in writing of the findings and any actions or next steps. In some cases, it may not be possible to provide full feedback, for example where sensitive information or data protection rules apply.

**Stage 3 - Appeal**

If you are not satisfied with how your concern has been handled, you may submit an appeal to a senior manager/HR Manager, who is more senior than the manager who dealt with the original concern.

Appeals can be made orally or in writing. You should clearly explain the reasons why you believe your concern was not properly addressed. In some cases, you may be invited to a meeting to clarify the grounds of your appeal. You may bring a colleague or trade union representative, and the HR Manager may attend if appropriate.

The manager handling the appeal will review the process followed in addressing your original concern and consider the grounds of your appeal. You will be informed in writing of the outcome as quickly as possible.

**Confidentiality and anonymity**

We encourage all employees to raise whistleblowing concerns openly and want you to feel confident doing so. If you raise a concern openly, we will keep your identity confidential as far as reasonably possible. Should it become necessary to disclose your identity to anyone during the investigation, we will notify you in advance.

You may also choose to raise a concern anonymously. You can do this via our internal whistleblowing reporting box which is located within the **first aid room** to ensure your anonymity and confidentiality. This box will be checked regularly and access will be limited to the HR Manager.

While anonymous reporting is better than remaining silent, it can make it more difficult for us to investigate fully, and we may not be able to provide feedback to you.

## Our commitment to you

You have the right not to suffer any detrimental treatment, including unfair penalties, disciplinary action, or dismissal, as a result of raising a whistleblowing concern in line with this policy. We will treat you with respect and provide any necessary support and protection throughout the process.

If you are told not to raise a concern, or you believe you have been treated unfairly for raising one, you should report this immediately to the HR Manager. Alternatively, you may raise it under our grievance procedure. Any retaliation will be treated as a serious disciplinary offence.

Raising knowingly false allegations is also a disciplinary matter and will be handled in line with our disciplinary procedure.

## Raising concerns externally

We encourage you to raise concerns internally first. If you feel that appropriate action has not been taken, you may also report the matter to the relevant prescribed body or person (see list on GOV.UK).

If you are considering going to the media, you should seek guidance beforehand, as whistleblowing protection under the law only applies in limited circumstances when doing so.

## Volati Whistleblowing Service

Questions or concerns should in the first instance be raised with the relevant manager as set out in this policy. If this is not possible, for example due to a conflict of interest or other concerns, the WhistleB whistleblowing service is available as an alternative reporting channel.

The Volati whistleblowing service can be used to report suspected misconduct or other serious irregularities. The service is provided by an external partner, and all reports are handled confidentially.

No person reporting in good faith should risk retaliation or negative consequences.

The whistleblowing service may also be used by persons outside the Volati Group, such as suppliers and business partners.

To access this service, please visit the Volati website at: www.volati.se and type ‘whistleblowing into the searchbox. This will take you directly to the service.

## Further guidance

If you need further guidance or support, you can contact the whistleblowing charity Protect or Citizens Advice for free confidential advice.