

Whistleblowing policy

1. ABOUT THIS POLICY

- 1.1 Matthew Algie are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.
- 1.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers at work. This may include bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, product safety, integrity, quality and labelling issues and any breach of legal or professional obligations.

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

Further information can be found via these links:

UK: <https://www.gov.uk/whistleblowing>

Ireland:

http://www.citizensinformation.ie/en/employment/enforcement_and_redress/protection_for_whistleblowers.html

3. HOW TO RAISE A CONCERN INTERNALLY

- 3.1 Concerns may be raised direct reporting manager; either verbally or in writing.
- 3.2 We hope that in many cases concerns will be able to be raised with the direct reporting manager. However, where there is preference not to raise it with the direct reporting manager for any reason, concerns should be raised to the Managing Director or a member of the HR team.

4. INTERNAL INVESTIGATION OF CONCERNS

- 4.1 We will arrange a meeting with the employee as soon as possible to discuss their concerns. They may bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.
- 4.2 Having met with the employee and clarified that the matter is in fact appropriate to this procedure we will carry out an assessment to examine what actions are required to deal with the concerns.
- 4.3 It is important to us that the employee feel assured that a disclosure made by them under this policy is taken seriously and that they be kept informed of steps being taken by us in response. In this regard, we undertake to communicate with them as follows:

- We will acknowledge receipt of the disclosure and arrange to meet with the employee as outlined above.
- We will inform the employee of how we propose to investigate the matter and keep them informed of actions, where possible, in that regards 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 them specific details of an investigation.
- We will inform them of the likely timescales in regards to each of the steps being taken, but in any event, we commit to dealing with the matter as quickly as practicable.

5. HOW TO RAISE A CONCERN EXTERNALLY

- 5.1 In the instance that the employee does not feel it appropriate to raise their concerns internally, they may report a concern to our whistleblowing hotline; [BKMS](#).
- 5.2 BKMS is an independent whistleblowing service that has been appointed by our company, maxingvest ag. Any and all concerns can be raised via their portal which can be found [here](#).

6. EXTERNAL INVESTIGATION OF CONCERNS

- 6.1 BKMS will share relevant reports to the Compliance Committee within Maxingvest ag. The Compliance Committee is an internal committee made up of representatives of maxingvest ag, Tchibo Coffee Service GmbH, Tchibo GmbH and the Chairman of the Works Council.
- 6.2 The Compliance Committee will liaise with the UK and Ireland Group, as well as any other relevant parties, such as the Data Protection team to investigate any raised concerns.
- 6.3 Where necessary the UK and Ireland Group, may contact external authorities to support with any investigation or disclose any illegal action.

7. CONFIDENTIALITY

- 7.1 So long as whistleblowers do not enter any identifying data points into their disclosures, the identity of the person will remain unknown and confidential.
- 7.2 Whistleblowers may wish to leave some form of contact details, including an anonymous email address, which allows for the investigators to reach out for more information or confirm a conclusion of the investigation.

8. EXTERNAL DISCLOSURES

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, the employee should not find it necessary to alert anyone externally, outside of BKMS.
- 8.2 The law recognises that in some circumstances it may be appropriate for the employee to report their concerns to an external body such as a regulator. We strongly encourage them to seek advice before reporting a concern to anyone external. However, if having done so and they still feel that the matter

should be reported to an external body a list of prescribed bodies to whom they can report any malpractice can be accessed by following the below links. Reporting a food crime can also be done anonymously via 0800 0287926 (<https://www.foodstandards.gov.scot/consumers/food-safety>).


UK: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>


Ireland: <http://www.irishstatutebook.ie/eli/2014/si/339/made/en/print>
amended by <http://www.irishstatutebook.ie/eli/2015/si/448/made/en/print>

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 9.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If they believe that they have suffered any such treatment, they should inform their direct reporting manager immediately. If the matter is not remedied, they should raise it formally using our Grievance Procedure.
- 9.3 The company must not threaten or retaliate against whistleblowers in any way. If they are involved in such conduct they may be subject to disciplinary action. In some cases, the whistle-blower could have a right to sue them personally for compensation in an employment tribunal.
- 9.4 However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

POLICY ENDORSEMENT

Endorsed:  Paul Chadderton – Managing Director Date: 03/7/2023

Endorsed:  Nikki Herridge – Head of Human Resources Date: 03/7/2023