

Hilton Foods Whistle-blowing Policy

Introduction

Hilton Foods is committed to a free and open culture and seeks to conduct its business honestly and with integrity at all times. We recognise 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.

All organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. It is our responsibility to put in place appropriate measures to identify such situations and attempt to remedy them.

Scope

This policy applies to all Hilton Foods business partners including employees, officers, agency workers, contractors, visitors to Hilton sites, suppliers, customers, communities and other third parties who provide services for or on behalf of Hilton.

Purpose

To encourage everyone to report any suspected business misconduct at the earliest opportunity and to give reassurance that genuine concerns can be raised without worrying fear of reprisals.

Policy

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

Confidential reporting or “whistle-blowing” is about helping people to raise legitimate concerns or worries about suspected business misconduct, wrongdoing or dangers at work and in so doing giving the business the opportunity to investigate and correct these. Examples could include:

- a criminal offence including bribery and fraud;
- breach of data protection and/or privacy;
- failure to comply 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;
- product fraud or deliberate non-conformance to specification;
- conduct likely to damage a customer’s brand and/or reputation;
- an accounting and other financial irregularity;
- damage to the environment;
- mis-selling or price fixing of products;
- bullying or harassment;

- rights or protection of individuals;
- a danger to the health and safety of any person; or
- the deliberate concealment of any of the above matters.

How to report business misconduct

- Report it to your line manager first, or if this is not appropriate speak to a senior manager, or
- Contact Safecall – available 24/7 365 days and in your preferred language. All reports are treated confidentially by Safecall and you may remain anonymous if you wish.



Call – **00 800 7233 2255**



Online – **safecall.co.uk/report**



Please note that the contact details above should not be used in the case of emergencies or any immediate threat to health and safety.

What happens when business misconduct is reported

All reported concerns will be investigated at an appropriate level and any necessary corrective action taken. We will communicate with you throughout the process including the conclusion as to whether the report was substantiated, partially substantiated or not substantiated.

All reported concerns, investigation conclusions and corrective action taken will be reported to the Hilton Food Group Board of Directors and/or Audit Committee.

Confidentiality

We want staff to feel able to voice whistle-blowing concerns openly under this policy. All reported concerns will be treated confidentially. We will respect, so far as we are able, any request for anonymity and where this is not possible we will make efforts to inform you.

Non-retaliation

We appreciate that the decision to raise a concern can be difficult as there may be a fear of reprisal from those who may be committing malpractice or others who may be involved. Hilton has a non-retaliation policy when a genuine concern has been reported in good faith. No action will be taken against you if you report such concerns,

even if it is found that there was no wrongdoing, unlawful conduct or compliance breach.

In some of the countries in which we operate the local law may protect you if you raise certain serious concerns through this policy.

Hilton will not tolerate victimisation of any person who raises a concern in good faith, even if it transpires that no malpractice has occurred, or is likely to occur, and will take appropriate steps to protect them, including taking disciplinary action, against anyone who is found to be pursuing any form of retaliation or has threatened to do so.

Disciplinary Action

Should you be found to have reported a concern falsely, maliciously or for personal gain, you may face disciplinary and/or legal action.



Philip Heffer, Chief Executive Officer

Site, Managing Director