

## 1. POLICY

It is the policy of the Company to:

- 1.1. encourage a free and open culture in dealings between management, employees and all people with whom it engages;
- 1.2. recognise that effective and honest communication is essential if wrongdoing is to be properly dealt with;
- 1.3. provide guidance to employees on the procedure to follow if they feel that they need to raise, in confidence, any concerns relating to the Company;
- 1.4. provide protection from repercussions where employees, in good faith, speak up regarding certain activities which might occur within the Company; and
- 1.5. take concerns raised by employees seriously and ensure that arrangements are in place for the proportionate and independent investigation of such matters and appropriate follow up action.

## 2. PROCEDURE

2.1. This policy applies where you wish to raise any matters of concern related to the Company in confidence, for example where you genuinely and in good faith believe that one or more of the following has been committed, is being committed, or is likely to be committed:

- criminal offence
- failure to comply with any legal obligation
- miscarriage of justice
- fraud
- failure to comply with any product quality, safety or integrity standards
- the health and safety of any individual endangered
- damage to the environment
- deliberate concealment of information relating to any of the above

2.2. It is preferable that any concerns are raised as soon as you have a reasonable suspicion, however you should not investigate your concerns to prove their validity. Details of any concerns should be reported honestly, accurately and without malice.

2.3. It is preferable where possible that you report any concerns that you have with your immediate manager or any other senior person within the Company with whom you feel comfortable. They will either act on the information that you give them, or pass it to a person who is more suitable to deal with it.

Alternatively, you may use the HR email [speakup@agbarr.co.uk](mailto:speakup@agbarr.co.uk) or write to the senior independent non-executive director at [asksusan@agbarr.co.uk](mailto:asksusan@agbarr.co.uk) as communication options.

- 2.4.** If the matter is not dealt with in a manner you feel is appropriate, or it is not possible to discuss the matter with your manager or senior management for any reason, you should report the matter to the senior independent non-executive director of the Company by writing to:

Senior Independent Non-Executive Director  
A.G. Barr p.l.c.  
c/o DICKSON MINTO W.S.  
Solicitors  
16 Charlotte Square  
Edinburgh  
EH2 4DF

- 2.5.** You should satisfy yourself that in making your disclosure you are acting in good faith and that you genuinely believe that the information and allegations are substantially true. If any allegation is made in bad faith then it may be considered a disciplinary offence.
- 2.6.** It is possible that further investigation will be necessary and you may be asked to attend a disciplinary or investigative hearing as a witness.
- 2.7.** Your identity will be kept confidential during the process.
- 2.8.** You will not in any way be liable to any repercussions, including loss of benefits, rights or prospects as a result of your action taken in good faith.
- 2.9.** The Company reserves the right to take disciplinary action against anyone who tries to victimise you because you have raised concerns about wrongdoing.
- 2.10.** Please note that this policy does NOT apply to complaints relating to your employment – these should be raised through the normal Grievance Procedure.

**Last Updated :** June 2020

**Last Reviewed :** June 2022