

MARSTON'S

WHISTLEBLOWING POLICY

This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, agency workers, partners and employees of our partners (our “people”).

Purpose and Scope

As part of Marston’s values, we are committed to conducting our business with honesty and integrity and we expect our people to act accordingly and maintain high standards. Any suspected wrongdoing should be reported as soon as possible, and it is important that anyone who has any concerns to report (“**whistleblowers**”) understands how to speak up and what will happen once a concern has been raised.

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes but is not limited to: suspected bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It also includes concealment of any of the above.

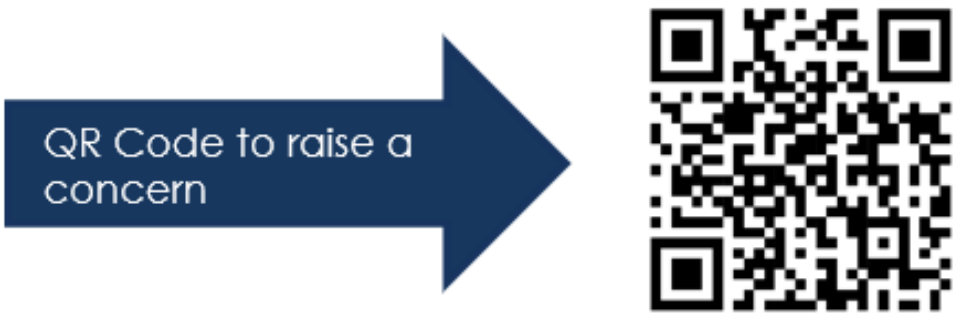
How to raise a concern

We hope that in most cases you will be able to raise any concerns with your Manager. If you prefer not to raise your concern with your Manager, you can contact the HR team or the Company Secretary.

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Where this is not possible, or where you would prefer to raise your concern anonymously, Marston’s has a confidential reporting portal called Speak Up which is provided by an independent third party. You can access the portal website through the following link: <https://marstons.integrityline.com/> or by scanning the below QR code.

Concerns raised via the Speak Up portal will be reviewed and actioned by the Legal Services team, who will instruct an appropriate investigation team. Anonymised reporting will be provided to a committee of the Board at least annually.



Confidentiality

We hope that our people feel able to voice concerns openly and by reading this policy understand how to do so and what will happen. We make every effort to ensure the identity of whistleblowers are kept confidential. The Investigation Team may be provided with the whistleblower’s identity to aid their ability to investigate concerns raised, but they will be advised that any information received through Speak Up is confidential. Whistleblowers can also choose to raise a concern anonymously and further information is provided below. Whistleblowers must also take appropriate action to ensure confidentiality.

What happens when a concern is raised through Speak Up?

When a concern is reported to the Speak Up portal the whistleblower will be asked to provide as much relevant information regarding their concern as possible. This is to enable the concern to be investigated.

Upon submission, an acknowledgement of receipt will be sent by the Secure Inbox. You can also add further detail and respond to questions from a Company representative to aid an active investigation.

Once a case has been concluded, this will be notified through the Secure Inbox. We may not be able to provide full details of the outcome of a case due to the confidentiality of all concerned.

Protection and support for whistleblowers

- We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern.
- If you are a whistleblower and you believe that you have suffered any such treatment, you should inform your line manager. Alternatively, you can contact the HR team or the Company Secretary. If the matter is not remedied to your reasonable satisfaction, you should raise it formally using our Grievance Procedure.
- If you believe you are the subject of a concern raised by a whistleblower, you must not threaten or retaliate against whistleblowers in any way or encourage others to do so. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, whistleblowers could have the right to take legal action against you personally if they suffer any detrimental treatment because of raising a concern.
- Whistleblowers must also act with integrity in raising the concern. If the Company concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

Protect operates a confidential helpline. Their contact details are:

- Telephone: 020 3117 2520
- Online advice line at: protect-advice.org.uk

POLICY OWNER

Vicky Gaunt

Head of Legal Services

vicky.gaunt@marstons.co.uk

FUTURE AMENDMENTS

This policy is not contractual, and we reserve the right to change this policy at any time, so please check back regularly to obtain the latest copy.

Where collective bargaining arrangements exist, the Company will consult the elected employee representatives prior to implementing such changes.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace by, or about, our people. In most cases whistleblowers should not find it necessary to alert anyone outside of Marston's.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone outside of Marston's. In addition to our own internal reporting lines, Protect operates a confidential helpline, details of which can be found here: <https://protect-advice.org.uk>

REVISION HISTORY

Version	Date	Revision Author	Summary of Changes
2	June 2021	Helen Whitehouse	Wording change.
3	June 2023	Helen Whitehouse	Update of Speak Up line contact method and minor wording.
4	June 2024	Helen Whitehouse	Addition of what happens when a concern is raised through Speak Up? Minor wording changes.
5	June 2025	Helen Whitehouse	Addition of <u>When a whistleblowing concern is raised outside of the Speak Up portal and your responsibility as an employee</u>
6	October 2025	Vicky Gaunt	Review of reporting mechanisms and responsibility.

Please keep this policy for your records