



## WHISTLEBLOWING POLICY

### **About this policy**

- As part of the Marston's way and our values, we are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards. Any suspected wrongdoing should be reported as soon as possible. It is important our people understand how to speak up.
- This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers.
- This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **What is whistleblowing?**

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes; 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**

1. We hope that in most cases you will be able to raise any concerns with your Manager or the HR team
2. If you prefer not to raise your concerns with your Manager or the HR team Marston's has a confidential reporting line called Speak Up. Contact details are:
  - o Telephone: **0800 007 3111**.
  - o E-mail **speakup@marstons.co.uk**
3. Concerns raised to Speak Up will be reviewed and actioned by Internal Audit, who will instruct an appropriate Investigation Team. Anonymised reporting will be provided to the Board at least annually.

### **Confidentiality**

We hope that all individuals will feel able to voice whistleblowing concerns openly under this policy. We make every effort to ensure your identity is kept confidential. The Investigation Team will only be provided with whistleblower's identity where it is necessary in aiding our ability to investigate concerns raised. The Investigation Team are advised any information received through Speak Up is confidential. This approach is taken as completely anonymous disclosures are difficult to investigate. The whistleblower must also take appropriate action to ensure confidentiality.



## **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 believe that you have suffered any such treatment, you should inform your line manager or senior HR member immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. [In some cases, the whistleblower could have a right to take legal action against you personally for compensation in an employment tribunal.] 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.
- Protect operates a confidential helpline. Their contact details are:
  - Telephone: **020 3117 2520**
  - Online advice line at: **[protect-advice.org.uk](https://protect-advice.org.uk)**

## **External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you 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.