

## Whistleblowing Policy

The Openfield Partnership: More than just grain.

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### Policy Statement

We are committed to conducting our business with honesty and integrity and we expect all our colleagues to maintain high standards in accordance with our ICARE values. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring unethical or illegal conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

"We are committed to conducting our business with honesty and integrity and we expect all our colleagues to maintain high standards in accordance with our Company Values."

#### *The aims of this policy are:*

- To encourage our colleagues and stakeholders (including members, suppliers, consumers, contractors, agency workers and the general public, etc) to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide colleagues and stakeholders with guidance as to how to raise those concerns.
- To reassure colleagues and stakeholders that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any colleague's contract of employment and we may amend it at any time.

### Responsibility for the Policy

The Executive Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The HR Department has day-to-day operational responsibility for this policy and will ensure that all managers and other colleagues who may deal with concerns or investigations under this policy receive appropriate training and understand the next steps to report any concerns.

The policy will be reviewed from a legal and operational perspective regularly by the HR Department.

All colleagues and stakeholders are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Colleagues and stakeholders are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the HR Department.

## What is Whistleblowing?

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Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- failure to comply with any legal obligation
- miscarriages of justice
- danger to health and safety
- damage to the environment
- bribery under our Bribery Policy
- financial fraud or mismanagement
- actions that may aid and abet any food or feed fraud
- negligence
- breach of our internal policies and procedures
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

Colleagues should not use this policy to report complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

If you are uncertain whether something is within the scope of this policy, you should seek advice from HR Department (contact details are at the end of this policy).

## Raising a Whistleblowing Concern

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### Colleagues

We hope that in many cases you will be able to raise any concerns with your Line Manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the HR Department.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- **HR Department**
- **Chief Executive Officer**

We will contact you as soon as possible to discuss your concern. Colleagues may bring a work colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and give you an indication of how we propose to deal with the matter.

## **External Stakeholders**

External stakeholders should raise any concerns with the Compliance Team by email or in writing. They will contact you as soon as possible to discuss your concern and to give you an indication of how we propose to deal with the matter.

Contact details are set out at the end of this policy.

## **Confidentiality**

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We hope that colleagues and external stakeholders will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to respect this. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. We do not encourage colleagues or stakeholders to make disclosures anonymously.

Proper investigation may be more difficult or impossible if we cannot obtain further information from you or share this during the investigation. It is also more difficult to establish whether any allegations are credible. Colleagues who are concerned about possible reprisals if their identity is revealed should come forward to the HR team and appropriate measures can then be taken to preserve confidentiality. External stakeholders who want to keep their identity confidential should discuss this with the Compliance Team when raising the concern.

If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

## **Investigation and Outcome**

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Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be asked to attend meetings to provide further information.

In some cases, we may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblowing colleague has made false allegations maliciously or with a view to personal gain, they will be subject to disciplinary action.

## **If you are not satisfied**

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While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts, their contact details are at the end of this policy.

## External Disclosures

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The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in the business. In most cases you should not find it necessary to alert anyone externally.

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. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage colleagues and external stakeholders to report such concerns to us first, using the appropriate contact detailed below.

## Protection and support for whistle-blowers

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It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, colleagues should inform the HR Department immediately and confirm this in writing. If the matter is not remedied, you should raise it formally within a reasonable period of time using our Grievance Procedure. External stakeholders should inform the Compliance Team immediately.

You must not threaten or retaliate against whistle-blowers in any way. If colleagues are involved in such conduct, they may be subject to disciplinary action.

## Contacts

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HR Department	Gaynor Hannen E-mail: <a href="mailto:Gaynor.hannen@openfield.co.uk">Gaynor.hannen@openfield.co.uk</a> 07484 534317
Compliance Team	Cecilia Pryce E-mail: <a href="mailto:compliance@openfield.co.uk">compliance@openfield.co.uk</a> 07980 871600
Chief Executive Officer	James Dallas <a href="mailto:James.dallas@openfield.co.uk">James.dallas@openfield.co.uk</a> 01476 862786
Protect (previously known as Public Concern at Work) (Independent whistleblowing charity)	Helpline: 020 3117 2520 Online Form : <a href="#">Click Here</a> Website: <a href="http://protect-advice.org.uk">protect-advice.org.uk</a>