Openfield

Whistleblowing Policy

The Openfield Partnership: More than just grain.

Author	Gaynor Hannen	Approving Authority	Chief Executive Officer & Exec Board
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Related International Standards	UK Employment Rights Act 2025, The Public Interest Discloser Act 1998), ILO Protection Against Unjustified Termination (Convention No.158), ILO Protection Again Retaliation & Victimisation (Convention No.190) UNGO specifically Principle 10 (Anti-Corruption)		
Related documents	Anti-Bullying and Harassment Policy, Business Ethics (Anti-Bribery & Gifts) Policy, Disciplinary Policy, Grievance Policy, Sexual Harassment Policy, Values and Behaviours Statement (ICARE)		

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 reporting:** Prompting our colleagues and stakeholders (including members, suppliers, consumers, contractors, agency workers and the general public) 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 clear guidance:** Offering colleagues and stakeholders with guidance as to how to raise those concerns.
- **To ensure absolute protection**: Reassuring colleagues and stakeholders that they can raise genuine concerns without fear of reprisals, discrimination, or disciplinary actions, 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 **Board of Executive Directors** 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 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 suggest ways in which this policy might be improved. Comments, suggestions, and queries should be addressed to the HR Department.

Targets & Objectives:

Openfield has the following targets and objectives:-

- **Training:** Provide all colleagues with Whistleblowing Training via the Atlas platform
- **Refresher Training:** all colleagues will be asked to re-take a refresher course every 3 years
- **Acknowledgment:** Receipt of the report will be acknowledged to the whistleblower within **7 business days**
- **Resolution Timeline:** We aim to conclude investigations within a reasonable timeframe (typically targeting resolution or comprehensive update within **90 days**).

What is Whistleblowing?

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

- criminal activity or negligence
- failure to comply with any legal or regulatory obligation
- miscarriages of justice
- danger to health and safety (including workplace conditions)
- damage to the environment
- bribery and corruption under our Business Ethics (Anti-Bribery & Gifts) Policy
- financial fraud, mismanagement, or money laundering
- actions that may aid and abet any food or feed fraud
- breach of our internal policies, human rights commitments, and procedures
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information or personal data
- 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.

What is excluded: Colleagues should not use this policy to report complaints relating to their own personal employment 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

For Colleagues

We hope that in many cases you will be able to raise any concerns with your Line Manager either in person or in writing. They may be able to agree a way of resolving your concern quickly and effectively, or 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 within a prompt timeframe to discuss your concern. Colleagues may bring a work colleague or union representative to any meetings under this policy. Your companion must respect the strict confidentiality of your disclosure and any subsequent investigation. We will take down a written summary of your concern and give you a clear indication of how we propose to handle the matter.

For External Stakeholders

External stakeholders (suppliers, consumers, contractors, agency workers and members of the public) should raise any concerns with the Compliance Team via email or in writing. The Team will contact you as soon as possible to discuss your concern and provide an initial indication of next steps.

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

Confidentiality & Anonymous Reporting

We strongly encourage colleagues and external stakeholders to voice whistleblowing concerns openly or confidentially under this policy.

- **Confidential Reporting:** If you wish to protect your identity, we will make every effort maintain strict confidentiality. If it becomes necessary for an investigator to know your identity, this will be discussed transparently before any disclosure is made.
- **Anonymous Reporting:** While we prefer open communications to allow for thorough follow-up and investigation, we accept fully anonymous reports. If you report anonymously, we will assess the credibility and details of the allegation to investigate it thoroughly as possible.

Colleagues concerned about possible reprisals should come forward to the HR team so that appropriate protective measures can then be taken to preserve confidentiality. External stakeholders should discuss confidentiality preferences 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, Timeline, and Outcome

Once a concern is raised, we will follow a structured, impartial process to ensure a fair assessment:

- Acknowledgment & Assessment: Receipt of the report will be acknowledged to the whistleblower within 7 business days. An initial assessment will determine if a formal investigation is warranted.
- Impartial Investigation: If an investigation is required, we may appoint an independent internal or external investigator with relevant expertise. To guarantee a fair hearing, any internal investigator with a potential conflict of interest regarding the case will be completely recused.
- Timely Updates: We aim to conclude investigations within a reasonable timeframe (typically targeting resolution or comprehensive update within 90 days). We will keep you informed of progress and milestones.
- Reporting Limitations: The need for confidentiality and data privacy may sometimes prevent us from providing specific details of disciplinary actions or proprietary metrics. You must treat any information shared with you regarding the investigation as strictly confidential.
- Malicious Allegations: If we conclude that a whistleblowing colleagues has intentionally made false allegations maliciously or for personal gains, they will be subject to an internal disciplinary action.

If you are not satisfied

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

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.

Official corporate compliance systems recognise that in some circumstances it may be appropriate for you to report your concerns to an external body such as an industry regulator or enforcement authority. It will very rarely if ever be appropriate to alert the media, and doing so may compromise necessary confidentiality protections. We strongly encourage you to seek independent advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline and maintains a comprehensive list or prescribed regulators for reporting specific 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. Under established corporate governance standards protections apply if you raise a valid concern regarding a third party. However, we strongly encourage colleagues and external stakeholders to report such concerns to us first, using the appropriate contact detailed below, so we can address the issue promptly within our supply chain.

Protection and Support for Whistleblowers

It is understandable that whistleblowers 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.

Whistleblowers 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.

- For Colleagues: If you believe that you have suffered any such treatment, you must inform the HR Department immediately and confirm this in writing. If the matter is not remedied internally, you should raise it formally within a reasonable period of time using our Grievance Procedure.

- For External stakeholders: You must inform the Compliance Team immediately if you experience any adverse impacts after reporting.

We operate a zero-tolerance policy towards victimisation: you must not threaten or retaliate against whistleblowers in any way. If colleagues are found to be involved in such retaliatory conduct, they will be subject to immediate disciplinary action, up to and including termination of employment.

Contacts

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

Policy Authorisation and sign-off

I approve this policy and authorise its implementation from the effective date above.



Chief Executive Officer