

Whistleblowing Policy:

Purpose and scope

To protect people raising matters of public interest to stop malpractice and wrongdoing.

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, suppliers, casual and agency staff. This policy and procedure is voluntary and does not form part of any employee's contract of employment and it may be amended at any time.

Introduction

Associated British Foods (ABF) encourages an open culture in all its dealings between employees and people with whom it comes in contact. Effective and honest communication is essential if malpractice and wrongdoing is to be effectively dealt with. The procedure below provides guidelines for individuals who feel they need to raise certain issues to ABF or their own employing subsidiary, in confidence ('whistleblowing'), and is designed to protect those raising a genuine concern from any detriment, in line with the Public Interest Disclosure Act 1998 or other jurisdictional legislation.

Usually concerns about issues at work can be easily resolved. However, when the concerns are about breaches of the law or regulations; serious misconduct by another person; health and safety matters; or financial malpractice it can be more difficult to know what to do. Individuals who have a reasonable belief that malpractice is occurring have a responsibility to speak out, in the confidence that they are supported by the Company.

By the end of this policy you should be able to understand:

- what constitutes malpractice or wrongdoing as covered by this policy;
- how to go about raising a concern when you believe malpractice or wrongdoing is occurring; and
- related policies and procedures/sources of support.

What is malpractice?

The aim of this policy is to provide a mechanism for reporting, investigating and remedying any malpractice in the workplace. The policy is designed to deter activities or behaviours posing a real and significant risk to the Company, members of its workforce or the public at large. Malpractice is where an area of the Company, or a team, or individual is undertaking activity which is wrong either by being:

- against the law, or in breach of operating regulations;
- an act of fraud, usually for personal gain, in breach of the Company's anti-fraud policy;
- where a person is failing, or has failed to comply with legal obligations;
- where a miscarriage of justice has, or is occurring;
- where the health and safety of an individual has been, or is likely to be, endangered;
- where there has been damage to the environment;
- where it is against Company policy, e.g., acceptance of bribes etc;
- where information tending to show any matter falling within the matters above has been, or is likely to be, concealed; or

- serious irregularities including in relation to the following:
 - accounting;
 - internal accounting control;
 - auditing;
 - bribery;
 - banking and financial crimes;
 - infringement of intellectual property rights;
 - confidentiality;
 - conflicts of interest;
 - discrimination;
 - sexual or psychological harassment;
 - the life and health or the physical or moral integrity of individuals; or
 - the Company's vital interests.

This is not an exhaustive list, therefore if there is anything else that you think the Company should be aware of please use the procedure outlined in this policy. By knowing about malpractice at an early stage we can take the necessary steps to safeguard the interests of everyone and our organisation.

This procedure is not a substitute for the normal Grievance Procedure or other relevant policies. The procedure is not a channel for raising matters in relation to your personal circumstances such as your terms and conditions of employment or your treatment at work. If you are uncertain whether something is within the scope of this policy you should seek advice from any of the alternative contacts identified below.

Your protection and confidence

It is natural to worry that by reporting issues that concern you at work you will be opening yourself up to victimisation or risking your job security. The Company's strong commitment to this policy means you can raise concerns about malpractice and be sure that you will be supported and protected from repercussions. Provided you have a reasonable belief that malpractice is occurring or is likely to occur, it doesn't matter if you are mistaken. There is no question of you having to prove anything. Employees should not pursue their own investigations, however well-intended, as flawed or improper investigation could compromise the Company's ability to take effective remedial or disciplinary action.

ABF will not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action.

Having raised your concern, the person to whom the disclosure has been made will, unless otherwise advised, act as your point of contact in the matter. They will be responsible for dealing with any instances of victimisation arising out of you raising your concern. Should you feel that there is any detriment to you, or your career, as a result of raising the concern, this should be reported immediately to the person to whom the disclosure was made. If you reasonably believe that you are unable to discuss the detriment with that person you should bring it to the attention of one of the other contacts listed in the section 'Alternative contacts' below.

We hope you feel able to voice any concerns openly under this policy. However, if you want to raise a concern confidentially the Company will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you. The Company does not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Company cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. If you are concerned about possible reprisals if your identity is revealed you should come forward to any of the individuals identified in the section 'Alternative contacts' below and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from our confidential external whistleblowing hotline, Expolink (contact details below), or Public Concern at Work, the independent whistleblowing charity.

Should you raise a concern under this policy you will be consulted on the outcome you wish to achieve. However there is a responsibility on your part. It is a disciplinary offence to raise an allegation maliciously. If the person making the disclosure is involved in malpractice the disclosure will not protect them from disciplinary action, where appropriate, but the disclosure will be taken into account regarding the penalty.

Personal data

You agree and consent to any use of your personal data in accordance with, and for the correct and proper operation of, this policy, including for the avoidance of doubt the use of any personal data in any confidentially or anonymously brought procedure under this policy. Save as otherwise set out in this policy, all personal data collected and processed in relation to the operation of this policy, shall be used and processed in accordance with our data protection policy.

We will endeavour to:

- inform any affected individuals or parties promptly whenever a complaint has been lodged attributing wrongdoing or improper conduct to them, unless doing so might jeopardise an investigation; and
- allow affected employees, where feasible, to learn the basic facts surrounding the complaint and to exercise their rights of access and correction.

How to raise your concern internally

Step 1: Tell your line manager/head of department

If you are concerned about any form of malpractice you should feel able to raise it first with your line manager. This is the normal way in which you should first raise the issue. There is no special procedure for doing this – you can tell him/her about the problem or put it in writing if you prefer.

Step 2: Alternative internal contacts

If you feel you are unable to raise the matter with someone in your immediate line management, for whatever reason, or if you feel that your line manager has not addressed your concern, please bring the issue to the attention of one of the alternative contacts identified in the section 'Alternative contacts' below or our confidential external whistleblowing hotline, Expolink (contact details below).

If you have reasonable grounds for believing that the board of directors of your employing company or that the ABF board of directors may be involved or condoning the activity you should first contact the Director of Legal Services and Company Secretary of ABF whose contact details appear in the section 'Alternative contacts' below.

Only if the nature of the matter is such that you cannot raise it with any of the contacts identified, or if you have followed the internal channels listed in Steps 1 and 2, and you still have concerns you should contact an external enforcement agency; usually a regulatory body or the police. It will very rarely if ever be appropriate to alert the media. Before you report a concern to anyone external we strongly encourage you to seek advice from the individuals listed in the 'Alternative contacts' below or our confidential external whistleblowing hotline, Expolink.

Concerns about malpractice usually relate to the conduct of the Company's staff, 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 you to report such concerns internally first. You should contact one of the individuals identified in the section 'Alternative contacts' below for guidance.

What will happen next?

Once you have reported your concern, the person to whom it has been raised will make any appropriate initial enquiries and carry out an initial assessment of how to proceed. This will be undertaken as quickly as possible, usually within five working days. As part of this initial assessment you may be asked to attend a meeting to explain your concerns. If so you will be able to bring a colleague with you, and a written summary of your concerns will be provided after the meeting. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. The initial assessment will often lead to a formal investigation, which depending on what is found will determine the action to be taken and the timescales involved. Your contact will keep you up to date on the outcome of any enquiries and investigations carried out and any actions taken, where it does not impact on the Company's duty of confidentiality to others. If your concern falls more properly within other policies (e.g. Discipline and Grievance etc.) your contact will tell you.

If you are unhappy with the response you receive, remember you can go to other levels detailed in this policy. The Company is committed to ensuring any such issues are handled fairly and properly. By using this policy you will help us to achieve this.

Summary

The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. In almost every case, raising concerns internally will be the most appropriate action for you to take.

Alternative contacts

Head of Internal Audit Team,
James Rushton,
Associated British Foods plc,
Weston Centre,
10 Grosvenor Street,
London W1K 4QY
Tel: 020 7399 6567

Any member of the Internal Audit Team

Director of Legal Services,
Paul Lister,
Associated British Foods plc,
Weston Centre,
10 Grosvenor Street,
London W1K 4QY
Tel: 020 7399 6512

Director of Company Secretariat
Roselyn Schofield,
Associated British Foods plc,
50-51 Russell Square,
London WC1B 4JA
Tel: 020 7299 3628

Expolink contact details

Country you are calling from	Freephone number
Argentina	0800 6662603
Australia	1800 121 889
Austria	0800 281700
Bahrain	80004475
Bangladesh	Bangladesh dials 157001 then the caller will either get through to the operator or hear a recorded message which will then prompt them to dial 8779167615.
Belgium	0800 71025
Brazil	0800 891 8807
Bulgaria	00800 110 44 74
Canada	1888 268 5816
Chile	123 002 004 12
China	400 120 3148
Croatia	0 800 222 845
Columbia	01800-944 4796
Costa Rica	08000440101
Cuba	Cuba dials 2935 then the caller will either get through to the operator or hear a recorded message which will then prompt them to dial 8779167615
Cyprus	800 95207
Czech Republic	800 142 428
Denmark	8088 4368
Egypt	0800 000 00 23
Eire	1800 567 014
Estonia	800 00 44 265
Finland	0800 116773
France	0800 900240
Germany	0800 182 3246
Greece	00800 441 31422
Hawaii	1866 293 2604
Hong Kong	800 930770
Hungary	06800 14863
Iceland	800 82 79
India	000 800 440 1286
Indonesia	001 803 0441 1201
Israel	1809446487
Italy	800 783776

Japan	00531 78 0023
Korea (South)	00308 442 0074
Latvia	8000 26 70
Lithuania	8800 30 444
Luxembourg	8002 4450
Malaysia	1800 807055
Malta	800 62404
Mexico	01800 123 0193
Netherlands	0800 022 9026
New Zealand	0800 443 816
Norway	800 14870
Pakistan	00800 900 44181
Peru	080053611
Philippines	1800 1442 0076
Poland	00800 441 2392
Portugal	800 880 374
Puerto Rico	1866 293 1804
Romania	08008 94440
Russia	810 800 2058 2044
Saudi Arabia	800 844 0172
Singapore	800 4411 140
Slovakia	0800 004461
Slovenia	0800 80886
South Africa	0800 990520
Spain	900 944401
Sri Lanka	011 244 5413 (dialling from Colombo omit 011)
Sweden	0200 285415
Switzerland	0800 563823
Taiwan	0080 10 44202
Thailand	001 800 442 078
Turkey	0850 390 1879
United Kingdom	0800 374199
UAE (United Arab Emirates)	8000 44 138 73
USA	1877 533 5310
Venezuela	0800 100 3199
Vietnam	120 11527

If there is no Freephone number, then collect call/reverse charge number steps are as follows:

1. Dial your country operator
2. Ask for an international collect call or reverse charge to 0044 1249 661 808
3. Operator will dial the number and speak to an Expolink operator who will accept the call and charges
4. Country operator connects caller to Expolink, leaves the call and then the call takes place as normal