



WHISTLEBLOWING POLICY

WHISTLEBLOWING POLICY

Whistleblowing is the raising of a concern ('Reportable Concern') either within the workplace or externally and applies to all employees including: contractors, agency-workers, appointed representatives, and third-party suppliers.

This Policy ensures that all employees understand the requirements and process pertaining to concerns of malpractice or wrongdoing.

This Whistleblowing Policy is applicable to all employees. For the purposes of this Policy, 'employees' includes all personnel, such as permanent employees; contractors; agency-workers; appointed representatives; directors; former employees; secondees; volunteers; agents and employees of subsidiary firms; and third-party suppliers.

The process is designed to enable employees to raise concerns and to disclose information which they believe is evidence of malpractice or impropriety without fear of reprisal and independently of line management, provided the disclosure is made in absolute good faith and in the reasonable belief of the individual (making the disclosure) that they intend to offer evidence of malpractice or impropriety.

The Policy is intended to encourage and enable employees to raise Reportable Concerns without fear of reprisals and anonymously if preferred. Under the Public Interest Disclosure Act (the Act) workers are protected from detrimental treatment or victimisation from their employer if, in the public interest and with a reasonable belief, they blow the whistle on wrongdoing. Virgin Wines has a zero-tolerance policy for reprisals against employees who raise their concerns and have reasonable belief that the information disclosed represents a Reportable Concern.

All disclosures are confidential and wherever possible the identity of the individual making the disclosure will be kept confidential so long as it does not frustrate the investigation.

Employees are strongly advised to put their name to any disclosures they make. Anonymous disclosures will be investigated at the discretion of the CEO.

Anyone raising a Reportable Concern should have a reasonable belief that the information disclosed represents a Reportable Concern. Unsubstantiated allegations which prove to have been made maliciously, or knowingly to be false, will be viewed seriously with disciplinary action applied as appropriate.

ROLES AND RESPONSIBILITIES

On an ongoing basis all employees **should**:

- Report known, suspected, or potential Reportable Concerns internally or externally. Reportable Concerns are defined under Appendix 1 and include: fraud; failure to comply with legal obligations; miscarriages of justice; damage to the environment; danger to the health and safety; deliberate concealment of information about any of these; a breach of Virgin Wines policies and procedures; and harming the reputation or financial well-being of Virgin Wines.

On an ongoing basis all employees **must**:

- Protect and maintain the confidentiality surrounding whistleblowing, including (i) the identity of people they know, or suspect may have whistleblown, or who are the subject of a Reportable Concern; and (ii) any protected data or information associated with a Reportable Concern.
- Not discuss Reportable Concerns being managed through the Whistleblower process, other than with those involved in the investigation into the Reportable Concern.
- Report reprisals, threatened or actual, or concerns about potential reprisals as a result of raising a Reportable Concern or participating in an investigation relating to a Reportable Concern, to Graeme Weir immediately (see procedure for contact details).

Where an employee raises a Reportable Concern with their Line Manager, the recipient of the Reportable Concern **must**:

- Treat the matter confidentially, where requested.
- Not ask, speculate or take any steps to find out if an employee has whistleblown, (if the Reportable Concerns are raised anonymously).
- Not ask the employee if they have already whistleblown.
- Ensure that the matter is immediately referred to the Whistleblowing procedure, with agreement of the employee (unless anonymous).

On an ongoing basis the employee involved with the Whistleblowing procedure **must**

- Keep Reportable Concerns confidential to the extent possible, subject to the need to meet legal and regulatory requirements. Disclosures that involve a threat to life or property, illegal activities or legal action against Virgin Wines may require actions that do not allow for complete anonymity. In such cases, should it be necessary to disclose the identity of the Whistleblower, where appropriate reasonable steps will be taken to discuss this with the Whistleblower first.
- Confirm receipt of a Reportable Concern to the Whistleblower (unless it is made anonymously).

- Investigate, or allocate for investigation, Reportable Concerns presented to the Whistleblowing representative and ensure investigations are undertaken in a timely manner.
- Inform the Whistleblower of the outcome and action taken in respect of the Reportable Concerns they make. The extent to which they can be informed will vary on a case by case basis.
- Satisfy themselves that individuals raising Reportable Concerns have not suffered reprisal as a result.

Reportable Concerns - Protection from Reprisal

- Virgin Wines will ensure that appropriate measures are taken to protect employees against reprisals as a result of raising a Reportable Concern, even if the disclosure is subsequently determined to be incorrect or is not substantiated.
- It is not acceptable to take 'reprisals' against an employee raising a Reportable Concern or otherwise take adverse action against an employee who raises a Reportable Concern or who objects to, or refuses to participate in an activity which they reasonably believe would breach any law or regulation.
- An employee who retaliates against anyone who raises a Reportable Concern will be subject to disciplinary action themselves.
- Virgin Wines will also take steps to provide similar protections to any employee who volunteers information as part of an investigation.

WHAT IS A REPORTABLE CONCERN?

A Reportable Concern is the disclosure of information relating to:

- Anything that would be the subject-matter of a Protected Disclosure (see below for further information).
- A breach of Virgin Wines policies and procedures; and
- Behaviour that harms or is likely to harm the reputation or financial well-being of Virgin Wines.

GRIEVANCES AND COMPLAINTS

Grievances

Personal employment related matters are generally not considered whistleblowing. The Group has separate procedures in place for dealing with employee grievances, details of which are set out in our Grievance Policy

Protected Disclosures

A Protected Disclosure is a report about:

- a criminal offence, e.g. fraud;
- a failure to comply with any legal obligation;
- a miscarriage of justice;
- damage to the environment;
- danger to the health and safety of any individual; or
- deliberate concealment of information about any of the above.

All employers must protect employees who make a Protected Disclosure

WHAT PROCEDURE IS FOLLOWED UNDER THIS POLICY?

If an employee believes that they have evidence relating to a reportable concern then they should disclose this by phone or in writing to:

Graeme Weir (CFO)

Ext. 7716

graeme.weir@virginwines.co.uk

Upon receipt, the relevant director will be notified and an investigation will be carried out if appropriate.

Virgin Wines will ensure investigations are undertaken promptly. Written acknowledgment of the concern will be sent to the employee and a written report will be issued on the outcome of the investigation. All responses will be sent to an employee's home address.

Any person who is the subject of a Reportable Concern that is investigated generally will be:-

- Informed as to the substance of the allegation where there are any adverse comments that may be included in a report arising out of any such investigations.
- Given a reasonable opportunity to respond to allegations.

If an employee is not satisfied that their concern is being properly dealt with they can raise this in confidence with our Group Chairman John Risman:-

John Risman

johnrisman@virginmedia.com



For additional queries please contact:
Human Resources
Email: humanresources@virginwines.co.uk
Virgin Wines, St James Mill,
Whitefriars, Norwich,
NR3 1TN
Tel: Ext 7712