

Speak Up (whistleblowing) Policy and Procedure

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Speak Up (whistleblowing) Policy Statement

All companies face the risk of things going wrong from time to time. As a healthy and successful organisation, Mpac is committed to engendering a culture where our employees and partners feel safe in reporting any concerns without fear of reprisal; be that from a safety, regulatory/compliance, or ethics perspective. Reporting of concerns is vital so that we can protect our employees, grow our business, and learn from our mistakes; helping to make Mpac a better place to work and to ensure we are living by our high ethical business standards.

The policy applies to everyone who works with Mpac, including:

- all Mpac employees, inc trainees
- contractors and subcontractors
- job applicants
- customers
- agency staff
- suppliers
- partners and consultants

Employees and our partners are encouraged to report even a reasonable suspicion of misconduct. Firsthand or full knowledge of the facts is not required to make a report.

Depending on the seriousness and sensitivity of the issue and who is suspected of the wrongdoing – concerns can be raised to:

- Any Line Manager
- Any member of the ExCom including the CEO or CFO
- The internal Speak Up e mail address: speakup@mpac-group.com

In general, people should feel free to raise matters with any of the above and be assured that confidences will be maintained on a need-to-know basis. However, if an employee is concerned about approaching any of the above, a confidential and independent helpline and website provided by NAVEX Global is available.

At Mpac, we will not tolerate malicious or intentionally false reports. Nor will we tolerate any victimisation of anyone raising a concern and will take appropriate action to protect our employees when they raise a concern in good faith. Any victimisation will be treated as a serious offence and dealt with under the disciplinary rules and procedure.



[Click here](#) to raise your concern via internal e mail.



[Click here](#) to raise your concern via NAVEX Global



You can also scan the QR code to raise your concern via Navex

Scan me!

Adam Holland
CEO



Speak Up (whistleblowing) Policy

1. Introduction

The Board of Mpac Group plc ("Mpac") is committed to operating to the highest standards of ethical behaviour. We have established certain principles and values which we expect everyone within the Group to adhere to, at all times. These principles, along with guidance to help assist with their application are contained in the Group's Code of Conduct.

This Speak Up Policy provides guidance if colleagues, customers, contractors or third parties have concerns about the conduct of the Company or an individual or any health or safety matter.

2. Objectives

2.1 The objectives of this policy are:

- to encourage colleagues, contractors, customers or any third parties to report suspected wrongdoing, unethical behaviour or health and safety concerns 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 as far as reasonably possible (for example, we may have to share any report with our external advisers or investigatory authorities).
- to ensure that any concerns are fully and fairly investigated by the appropriate people so that Mpac can learn from any mistakes, best protect our employees and our business and ensure that any unethical conduct is prevented or stopped.
- to reassure colleagues, contractors, customers or any third parties that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- to provide colleagues, contractors, customers or any third-party suppliers with guidance on how to raise concerns.
- to have concerns dealt with by local management, if possible, but if not by the appropriate Executive Leadership Team member.
- To provide a confidential method of raising concerns externally.
- to ensure that the Ethics Policy is complied with.

3. What should you report?

3.1 Any information or legitimate concerns which relates to suspected wrongdoing or dangers at work. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that there are wrongdoing or dangers at work.

This may include:

- criminal activity.



- danger to health and safety.
- damage to the environment.
- failure to comply with any legal or professional obligation or statutory requirements.
- bribery.
- financial fraud or mismanagement.
- negligence.
- breach of internal procedure (including code of conduct).
- discrimination, harassment, or unfair employment practices involving other people (note that if the issue relates to mistreatment of you at work, you should use our Grievance Procedure instead).
- unethical behaviour.
- the deliberate concealment of any of the above matters.

3.1 If you have any genuine concerns related to a suspected wrongdoing or danger affecting any of the above activities, you should report it under this policy.

3.2 This policy should not be used for complaints relating to your own personal circumstance, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

4 Seeking Advice

4.1 If you are unsure about whether to raise a concern, you can seek advice from Mpac's General Counsel, any member of the HR Team, or any manager or leader in the business.

4.2 At some of our sites, there may be trained advisors available who can provide advice and guidance on how best to address your concerns. Please contact your HR team, who can share the names and contact details of these individuals.

4.3 Alternatively, you can seek support from registered organisations that provide independent and confidential guidance, which can be found online. If you need any guidance on who the right organisation is to speak to in your country of residence, please speak with a member of your local HR team.

5 Raising a Concern

5.1 In almost all cases concerns should be raised formally through the internal channels first before going to an external body

5.2 We understand in some cases the concerns may be so severe that you believe contacting supervisory authorities or regulators relevant to the issue is the right thing to do. Please refer to section **7 - External Disclosures** for further guidance on this.

5.3 There are various ways you can raise a concern, either in person, in writing, or via confidential and independent helpline.



In Person:

We hope that you will feel able to raise any concerns with your line manager, in person, in the first instance. They are likely to be able to agree a way of resolving your concern quickly and effectively. In a case where you don't feel comfortable raising concerns with your direct line manager you can go to any Line Manager or a member of the ExCom including the CFO or CEO and be assured that confidences will be maintained on a need-to-know basis.

In Writing:

If you do not feel comfortable raising a concern in person with any of the Managers or Leaders mentioned above, you may email them directly and they will address your concern.

Alternatively, you can use our dedicated SpeakUp@mpac-group.com mailbox. Messages sent to this address will be directed to Mpac's General Counsel, who will review the matter and initiate the investigation process. In the absence of the General Counsel, the CFO will assume responsibility for managing the process.

Via a confidential and independent helpline:

If you are concerned about approaching an internal manager or leader, or you feel that discussing an issue with them is not appropriate, or that they have not addressed your concern, you can raise the matter using the confidential and independent helpline and website provided by NAVEX Global. [Click Here](#) to go to the NAVEX Global website.

In the Netherlands you may wish to report your case externally to the Dutch Whistleblowers Authority (HvK), Dutch Labour Inspectorate, however please refer to **section 7 - External Disclosures** for further guidance on this.

In all cases, please follow the internal process detailed in Appendix 1.

- 5.4 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation and will inform you of the outcome. You may be asked to attend additional meetings to provide further information if your concern requires further clarification. In all cases we will follow the timescales below:

Acknowledgement of receipt: We will acknowledge receipt of your report within 7 days of receiving it.

Follow-up and feedback: We will provide feedback to the employee who raised the concern within 3 months from the acknowledgment of receipt. This feedback will inform the individual of actions taken or planned (e.g. starting an investigation, referring the case, closing it, etc.).

Extension (in complex cases): The feedback deadline can be extended to 6 months, but only in duly justified cases due to the complexity of the matter.



6. Confidentiality and Data Protection

- 6.1 We hope that our colleagues, contractors, customers or any third parties will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity private. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you beforehand.
- 6.2 If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Group HR Director and appropriate measures can then be taken to ensure confidentiality.
- 6.3 You are entitled to raise an issue on an anonymous basis through NAVEX Global. Where we receive anonymous complaints, we will investigate the complaints as far as is reasonable considering:
- the seriousness of the issue raised;
 - the credibility of the concern; and
 - the likelihood of confirming the allegation from other sources.
- 6.4 As part of the application of this policy, we will collect, process and store personal data in accordance with our Data Protection Policy and we will comply with the requirements of Data Protection Legislation.

7. External Disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace.
- 7.2 Exceptions – When External Reporting is Allowed First
- You may go directly to an external body (e.g. a regulator or authority) without first reporting internally if:
- There is a reasonable fear of retaliation.
 - You believe internal reporting would be ineffective, for example if Board Level colleagues are involved in the wrongdoing.
 - There is imminent or serious danger to public interest (e.g. environmental disaster, health risk).
 - Where you have reasonable grounds to believe that the internal procedure is not functioning properly.
- 7.3 It will never be appropriate to share details of any concern or matter raised on any social media platform. Employees are reminded that any breach of the Mpac Communication and Social Media Policy may result in Disciplinary action.

8. Investigations and Outcomes

- 8.1 Mpac's General Counsel is responsible for managing and resolving all concerns raised, regardless of the channel through which they are submitted, in a timely manner (refer to section 5 for timescales).
- 8.2 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. We may in some circumstances,



appoint an external person or body to investigate the concern. The investigator(s) will collate findings on the matter and may make recommendations for change to enable us to minimise the risk of future wrongdoing.

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

8.4 If we conclude that you have made false allegations maliciously, you may be subject to disciplinary action.

8.5 Where appropriate, we will share the outcome of the investigation with you. If you don't feel that the outcome sufficiently addresses your concerns you should escalate your case to the Mpac Board in the first instance.

9. Protection for those raising concerns

9.1 Those reporting legitimate concerns do not need a qualifying period of service to bring a claim of unfair dismissal: in other words, staff are protected as soon as they join the organisation.

9.2 Legal protection is afforded to workers as well as employees; this includes staff on casual contracts, freelance workers, seconded workers, trainees, and agency workers.

9.3 Protection from detriment also applies to ex-employees making disclosures after the termination of their employment. Furthermore, protections will be extended to job applicants, which will prevent organisations from blacklisting applicants because they have made protected disclosures against previous employers, and also any third party connected to the Whistleblower (e.g. colleagues or family members).

9.4 It is understandable that sometimes individuals are worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.5 Colleagues must not suffer any detrimental treatment as a result of raising a genuine 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, you should inform the Group HR Director immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

9.6 Colleagues must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

10. Notification

10.1 The Executive Leadership Team may decide that it is necessary to notify the Board of any serious wrongdoing or risk identified by any concerns raised via the Speak Up Policy.

10.2 Otherwise, the Board will be issued a biannual summary of concerns / matters raised.

Appendix 1 – Speak Up Raising a Concern Process

