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Oscar Mayer: Whistleblowing Policy

Whistleblower Policy

Purpose



- ☐ Encourage Employees
- ☐ Create Awareness
- ☐ Guide for Stakeholders
- ☐ Corporate Governance

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1.Foreword

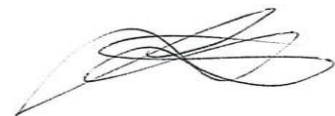
At Oscar Mayer, our commitment to the highest standards of integrity, quality and safety is the cornerstone of everything we do. In our industry, where technical excellence and trust underpin every process, it is vital that every employee feels empowered to speak up when something doesn't seem right and to be able to do so without fear, favour or consequence.

Our Whistleblowing Policy is not just a document. It is a vital part of our culture of accountability and transparency. Whether the concern relates to food safety, legal compliance, ethical conduct or any behaviour that goes against our values, we all share a responsibility to protect the business and one another by raising issues early and responsibly.

As Chief People & ESG Officer, I want to personally reassure every colleague at every level across all three sites that raising a genuine concern is a courageous and commendable act. We will take all reports seriously, investigate them impartially and protect those who come forward in good faith. Speaking up protects our products, our colleagues, our customers, and the integrity of our brand.

This policy sets out clear, confidential routes for reporting concerns and reflects our zero-tolerance approach to retaliation. It is designed to support a safe, respectful workplace where doing the right thing is always the right thing to do.

Thank you for helping to uphold the standards we should all expect of ourselves and of each other, here at Oscar Mayer.



Sarah Hill
Chief People & ESG Officer

2. Policy Statement

2.1 We seek to conduct our business honestly and with integrity at all times and accordingly we promote a culture of openness and accountability. However, we acknowledge that all businesses face the risk of things going wrong from time to time, or that concealed malpractice, illegal or unethical conduct may take place. Any suspected, wrongdoing should be reported as soon as possible.

2.2 This policy is in place to allow all employees and workers to report suspected or actual occurrences of illegal, unethical or inappropriate events, behaviours or practices without retribution and to provide guidance on how to make a report and how it will be handled. This policy applies to all companies within the Oscar Mayer Food Group;

- Oscar Mayer Wrexham (previously known as Rowan Foods)
- Oscar Mayer Flint
- Oscar Mayer Erith (previously known as Ferndale Foods)

When we say '**we**' or '**us**' or '**our**' in this policy, we are referring to the business which employs you, which you supply or where you are working. When we say 'Group' in this policy, we are referring to that business and the other companies within the Oscar Mayer group of companies. When we say '**you**' or '**your**' in this policy, we are referring to all those who attend our sites or businesses to carry out work or services on our behalf and to those who work in our supply chain. This policy does not form part of your contract of employment (where applicable), and we may amend it at any time. We will review the policy from time to time to ensure that it continues to reflect our legal obligations and the Company's organisational and business needs.

3. Responsibility

Everyone has a role to play in ensuring the success of this policy, this policy should be followed to report any suspected danger or wrongdoing as soon as

possible. All managers must set an appropriate standard and must proactively promote awareness of this policy and ensure concerns are taken seriously.

4. What is Whistleblowing?

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

- **Criminal activity, including bribery or fraud**
- **Failure to comply with any legal obligation**
- **Breach of our internal policies and procedures**
- **The offering, taking or soliciting of bribes**
- **Any other forms of corruption or unethical behaviour**
- **Animal welfare abuses**
- **Anticompetitive behaviour**
- **Food safety, quality, product integrity or legality issues**
- **Financial fraud or mismanagement including mis-reporting performance of the Group or facilitating tax evasion**
- **Unauthorised disclosure of confidential information**
- **Miscarriages of justice**
- **Failure to comply with legal or professional obligation or regulatory requirements**
- **Danger to Health and Safety**
- **Damage to the environment**
- **Mis-selling of product**
- **Negligence**
- **Conduct likely to damage our brand, reputation or financial wellbeing**
- **Conduct likely to damage the brand, reputation or financial wellbeing of our customers or suppliers**
- **Concealment of any of the above**

4.1 If you have a genuine concern about any of the above you should report it under this policy as a whistleblowing concern, it will then be investigated. It is not necessary for you to have gathered evidence or proof, provided you have a genuine concern this should be reported.

4.2 This policy should not be used for complaints or concerns regarding your own personal circumstances. In those situations, you should use our Grievance Procedure or Bullying and Harassment Procedure.

5. Who is a Whistleblower?

A whistleblower is someone who raises a genuine concern relating to suspected wrongdoing or dangers affecting any of our activities, as set out in section 4 above. We will describe such genuine concerns in the rest of this policy as ***'whistleblowing concerns.'***

6. Confidentiality

6.1 We do not encourage anonymous reporting of whistleblowing concerns and would urge you to raise your whistleblowing concern openly under this policy, as anonymous reports are often difficult to investigate.

6.2 You may decide to request confidentiality when raising your whistleblowing concern. If this is the case, we will make every effort to keep your identity secret and will discuss with you in advance where we feel that it is necessary to reveal your identity to those involved in investigating your concerns.

7. Raising Whistleblowing Concerns

7.1 If you do have a whistleblowing concern, you should report it without delay. We encourage you in the first instance to raise any whistleblowing concerns with your line manager and you may speak to them in person or put your concern in writing if you prefer. Your line manager may be able to identify a way of resolving the whistleblowing concern quickly and effectively. However, we recognise that there will be occasions when it is inappropriate for you to report the whistleblowing concern to your line manager, for example if you feel uncomfortable doing so, if the whistleblowing concern is very serious, or

if your line manager has failed to address it. In such circumstances, you should raise your whistleblowing concern with your People Department.

7.2 We recognise that in some circumstances it may be appropriate for you to report concerns via our Confidential Phonenumber. This is a free 24/7 hot line managed by an expert third party and independent company (Navex Global). We have entered into a service level agreement with Navex Global to ensure that whistleblowing reports are managed to appropriate timescales, escalated appropriately and that confidentiality is maintained. Interpreters can be requested where needed. Posters advertising and informing about the Confidential Phonenumber are displayed in all our sites. Further information regarding the Confidential Phonenumber is provided in the Annex to this policy.

8. Handling of Whistleblowing Report

We hope that you will feel able to report whistleblowing concerns openly under this policy, but if you do wish to raise your whistleblowing concern confidentially, we will do our best to keep your identity confidential and will not disclose it without discussing it with you first. We do not encourage you to raise concerns anonymously, as it may make investigation more difficult. For example, it may make it difficult to establish whether allegations are credible. If you are concerned about possible reprisals or retaliation should your identity become known, we can take appropriate measures to preserve confidentiality. If you are in any doubt then you can obtain advice from Protect, the independent whistleblowing charity which was formerly known as Public Concern at Work.

Protect offers a confidential helpline and their contact details are at: <https://www.pcaw.org.uk/contact-us/>

Once you have raised a whistleblowing concern, whether it is directly to an internal person or through our confidential help line, we will carry out an initial assessment to determine the scope of any investigation and where it is appropriate and practical to do so. We will arrange a meeting with you to discuss your whistleblowing concern, and we will endeavour to report back to you within seven working days of any such meeting with you or from receiving the concerns via the confidential portal.

Where it is appropriate to do so, we will then appoint a manager to investigate your whistleblowing report. The investigating manager will be independent of the whistleblowing concern and will be of appropriate seniority. The investigating manager will then undertake any further investigations which they consider relevant, which may include asking you to attend additional meetings to provide further information. The investigating manager may appoint individuals with specific knowledge of the subject matter of your whistleblowing concern to assist in the investigation.

The investigating manager will ensure confidentiality is maintained unless the individual concerned waives their right to confidentiality. The investigating manager will also ensure that the investigation and any actions taken because of findings made are documented and will determine whether there is a need to notify a regulator or other enforcement body.

We will aim to keep you informed of the progress of the investigation and likely timescale. We will also aim to provide you with a summary of the outcome of the investigation. However, there will be times when the need for confidentiality prevents us from giving you specific details of the investigation, or of any action taken as a result (for example, specific disciplinary action taken). Whilst we cannot guarantee the outcome you are seeking will be implemented, we will deal with your concern fairly and in an appropriate way.

9. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and resolving any wrongdoing in the workplace. 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 and we would refer you to Protect (see details in the paragraph above). Whistleblowing concerns usually relate to the conduct of workers, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider.

We encourage you to report such concerns internally first in accordance with this policy.

10. No Retaliation or Reprisals

We understand that whistleblowers are sometimes worried about possible repercussions. We encourage openness and we support those who raise whistleblowing concerns under this policy, even if they turn out to be mistaken. A whistleblower must not receive any detrimental treatment as a result of making a whistleblowing report. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a whistleblowing report.

If someone else makes a whistleblowing report, you must not threaten or retaliate against them in any way. If you are involved in such conduct, you may be subject to disciplinary action up to and including dismissal and in some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.