

# WHISTLEBLOWING POLICY

## In Summary

Jenkins Freshpac Systems Ltd is committed to providing an environment where our employees feel empowered to speak up when they see an activity or behaviour they feel is wrong or does not match our values or processes. The purpose of this policy is to ensure employees feel safe raising concerns and to provide a clear and confidential process for reporting.

## What conduct should be reported?

Any employee that witnesses or becomes aware of misconduct, immoral, or illegal behaviour is encouraged to report it. The Whistleblowing process can be used for activities and behaviour that;

- Negatively impacts BRC/Food Safety Culture
- Violate laws, legislations, or regulations
- Is fraudulent, corrupt, dishonest, or unethical
- Negatively impacts Health & Safety Culture
- Breaches company policies or procedures

For discrimination, bullying, and/or Harassment please refer to P020 Workplace Bullying Policy.

## Making a report

There are three options available to employees should they want to file a Whistleblowing Report;

- Scan the QR code or enter the web address on posters found around our sites to complete an online form. This can be done using a company or personal device.
- Complete a paper form and drop it into the Continual Improvement / Whistleblowing box found in the cafeteria at our Tauranga site.
- Speak directly to the Whistleblowing Officer or a manager, supervisor, or people leader.

## Anonymous Reporting & Confidentiality

When submitting a Whistleblowing report form, the informant can control the level of personal (identifying) information revealed;

- Confidential – Initially the informant's identity shall only be revealed to the Whistleblowing Team. A Whistleblowing officer will then seek their consent in relation to how they would prefer information about their identity to be handled throughout the investigation. The Informant's identity will only be revealed to other parties where necessary and only after gaining their consent.
- Anonymous – While completing the form all personal information is left blank, no one will be aware of your identity.

Jenkins Freshpac Systems Ltd will do its best to investigate all submitted reports, however there can be limitations to the results of an investigation if the informant chooses to remain anonymous. For this reason, we encourage employees to include their identity while reporting.

## How we will respond

Once the Whistleblowing team receive a report they will;

- Consider the information provided and decide the degree of investigation required.
- Establish a correspondence with the informant if their identity is known. Reporting back to them throughout and following the investigation.
- Determine if there are any conflicts of interest prior to investigating.
- Establish who needs to be involved in the investigation (Informant consent required).

Once an investigation has been completed it will be handed over to management to enact any subsequent actions. These actions may lead into other processes, for example; corrective action or BRC incident investigation.

## Protecting Informants

Jenkins Freshpac Systems Ltd will take all possible steps to protect the informant from suffering retaliation as a result of a truthful report. The Informant has the right to;

- Remain anonymous. Not only when reporting but also during and following the investigation.
- Protection against disciplinary action, performance management, termination, discrimination, harassment, or bullying.

The risk of retaliation will be considered and the following actions taken where practical and necessary;

- Informant taking leave
- Informant temporarily reassigned to other duties or tasks
- Disciplinary action against persons retaliating.

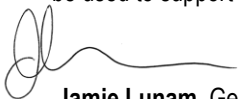
If the informant feels they have already been retaliated against, they should escalate this immediately to the General Manager.

## False Allegations

Protections offered by this policy and the Protected Disclosures Act 2000 do not apply where the informant makes a report they know to be false. If an informant is found to have deliberately provided untruthful or misleading information disciplinary action may be taken against them.

## Roles & Responsibilities

- Whistleblowing Officer – This individual owns the Whistleblowing program. They are responsible for the investigation of reports and management of the Whistleblowing process.
- Deputy Whistleblowing Officer – This individual responds to reports in the absence of the Whistleblowing officer. They may also be used to support investigations at the request of the Whistleblowing officer.



Jamie Lunam, General Manager