



# **Whistleblowing Policy**

**(NI)**

## **1. About this Policy**

**1.1** We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

**1.2** This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

**1.3** This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. What is Whistleblowing?**

**2.1** Whistleblowing is the making of a "protected disclosure". A protected disclosure is the disclosure of relevant information, namely information which in the reasonable belief of a worker, tends to show one or more relevant wrongdoings and which came to the attention of the worker in connection with his or her employment or engagement by Coca-Cola HBC Northern Ireland Limited. .

**2.2** Relevant wrongdoing includes the following:

- (a)** that a criminal offence has been, is being or is likely to be committed;
- (b)** a failure to comply with any legal obligation other than one arising under the contract of employment of the person making the disclosure;
- (c)** a miscarriage of justice;
- (d)** the endangering of the health and safety of any individual;
- (e)** damage to the environment;
- (f)** unlawful or improper use of funds or resources of a public body;
- (g)** an act or omission by or on behalf of a public body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement; or
- (h)** the deliberate concealment of any of the above matters.

**2.3** The aims of this policy is to encourage the reporting of suspected relevant wrongdoing as soon as possible in the knowledge that reports will be taken seriously and investigated as appropriate and that a worker will be protected from any repercussions when disclosing a genuine concern. This policy should not be used to raise complaints relating to your own personal circumstances or your terms and conditions of employment, such as the way you are being treated at work or workplace issues affecting you personally. In such cases, you should refer to the Grievance Procedure.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Code Compliance Officer(s) whose contact details are contained in the Appendix.

### **3. How to Raise a Concern**

**3.1** We hope that in many cases you will be able to raise any concerns with your line manager. Your line manager may be able to agree a way of resolving your concern quickly and effectively. However, where you prefer not to raise it with your manager for any reason, you should contact either your Code of Compliance Officer(s), the Whistleblowing hotline or CCH 'Speak Up!' phone line. Further information is at the end of this policy.

**3.2** We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

### **4. Confidentiality**

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

### **5. External Disclosures**

**5.1** The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

**5.2** 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. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### **6. Protection and Support for Whistleblowers**

**6.1** We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

**6.2** Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform Code of Compliance Officer(s) immediately.

**6.3** You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

**6.4** However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

**6.5** Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

## **7. Contacts**

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| <b>Speak Up! Line</b>  | <a href="http://www.coca-colahellenic.ethicspoint.com">www.coca-colahellenic.ethicspoint.com</a>   |
| <b>Whistleblowing Hotline</b>  | <a href="mailto:code.ofbusinessconduct@cchellenic.com">code.ofbusinessconduct@cchellenic.com</a>   |
| <b>General Manager (IOI)</b>   | Simon Fitzpatrick<br><a href="mailto:simon.fitzpatrick@cchellenic.com">simon.fitzpatrick@cchellenic.com</a><br>028 9262 0520                                   |
| <b>Legal Director (IOI)</b>  | John Kealy<br><a href="mailto:john.kealy@cchellenic.com">john.kealy@cchellenic.com</a><br>00353 1 880 7100   |
| <b>Public Concern at Work<br/>(Independent whistleblowing charity)</b> | Helpline: (020) 7404 6609<br>E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a><br>Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a> |