

Speaking Out Policy

1. What is Speaking Out?
2. What is this policy for?
3. What is the difference between Speaking Out and raising a grievance?
4. What you should do if you have a concern
5. How your concerns will be investigated
6. Speaking Out and confidentiality
7. Protection and support if you Speak Out
8. Who to contact to Speak Out
9. The fine print

Speaking Out helpline via Hospitality Action: 0808 801 0351

1. What is Speaking Out?

At Whitbread, we are committed to living our values everyday. We are **genuine** through our open and honest actions, we are **confident** in how we go about our business and we are **committed** to caring for all of our teams and our customers. This is a responsibility we ask every member of the Whitbread family to fulfil everyday, and we set out these commitments in our Whitbread Global Code of Conduct.

Occasionally there may be situations where this commitment is not being met by everyone. In these cases, we want you to feel comfortable speaking out so that we can identify and resolve any issues.

Speaking out is when *anyone* (not just a team member) raises a concern about a wrongdoing or danger within the Company. This might be about a team member, line manager, a third party or even a customer doing something you think is wrong.

The following lists some of the possible actions that could lead to someone speaking out. (This is not an exhaustive list but gives you an idea.)

- Someone's health or safety is in danger
- Theft or Fraud (and attempts to conceal theft or fraud)
- Criminal activity
- The Company isn't obeying the law
- Bribery
- Damage to property or the environment
- Miscarriages of justice
- Inappropriate conduct

Specific examples you might witness in our industry could be:

- a manager encouraging or knowingly selling of out of date food
- a site knowingly employing someone who is underage or an illegal worker
- a manager being bribed by a supplier to recommend them
- a team member falsifying their hours
- someone giving stock away to their family or friends

2. What is this policy for?

Sometimes it's hard to know whether to come forward, or who to speak to in a difficult situation. This Speaking Out policy has been put in place so that we all know what to do if we witness something we believe is wrong, and so that you know you're safe and supported if you decide to speak out.

The aim of this policy is to:

- Ensure you feel supported in speaking out and confident that everything you share will be taken seriously and treated confidentially
- Reassure you that you can raise genuine concerns without fear of reprisal or 'payback', even if it turns out that you are mistaken
- Make sure that all wrongful, illegal, fraudulent or dangerous conduct at Whitbread is identified and addressed
- Provide you with a clear procedure for reporting any incidents that concern you, and how your report will be managed
- Raise awareness of the Speaking Out helpline that is available to all of our team members, no matter where you work

This policy applies to every Whitbread team member, and sets out how you can report any suspected wrongdoing. It also applies to any of our suppliers, shareholders, customers, apprentices, contractors or third parties, such as agents, distributors or joint venture partners.

3. What is the difference between Speaking Out and raising a grievance?

Generally, Speaking Out applies in cases where you are not directly affected by the wrongdoing or danger you're reporting, whereas if you raise a grievance it's about something which affects you personally.

In Speaking Out, you are unlikely to have a direct interest in the outcome of any investigations into the concern you have raised; you are just trying to alert others that something bad is happening. It's also important to note that if you speak out, you are not expected to prove the misconduct. You are simply a messenger raising a concern so that it can be investigated further.

On the other hand, if you wish to raise a concern which is of personal interest to you, you should refer to the [Grievance Policy](#). This policy applies when you are seeking an outcome for yourself—for instance if you feel you have personally been treated unfairly. In this case, you would be expected to provide evidence to support your allegation. You can find the [Grievance Policy](#) on the Intranet, Ask HR or in your handbook.

If you are not sure whether to use the Grievance Policy or the Speaking Out Policy, please speak to your Line Manager or the HR Manager for your region. If you would like to speak to someone independent outside of the Company, you can contact the Speaking Out helpline (detailed below).

4. What you should do if you have a concern

We hope that you feel comfortable talking about any worries or problems with your line manager or another responsible person at work. However, we realise that speaking out can be difficult, especially if you have raised your concern previously and it hasn't been addressed.

In this situation, you can contact our independent and confidential Speaking Out helpline, open 24 hours a day, 365 days a year. This service is provided by [Hospitality Action](#). You don't have to leave your name, but you will be encouraged to do so if it will help us to resolve the problem.

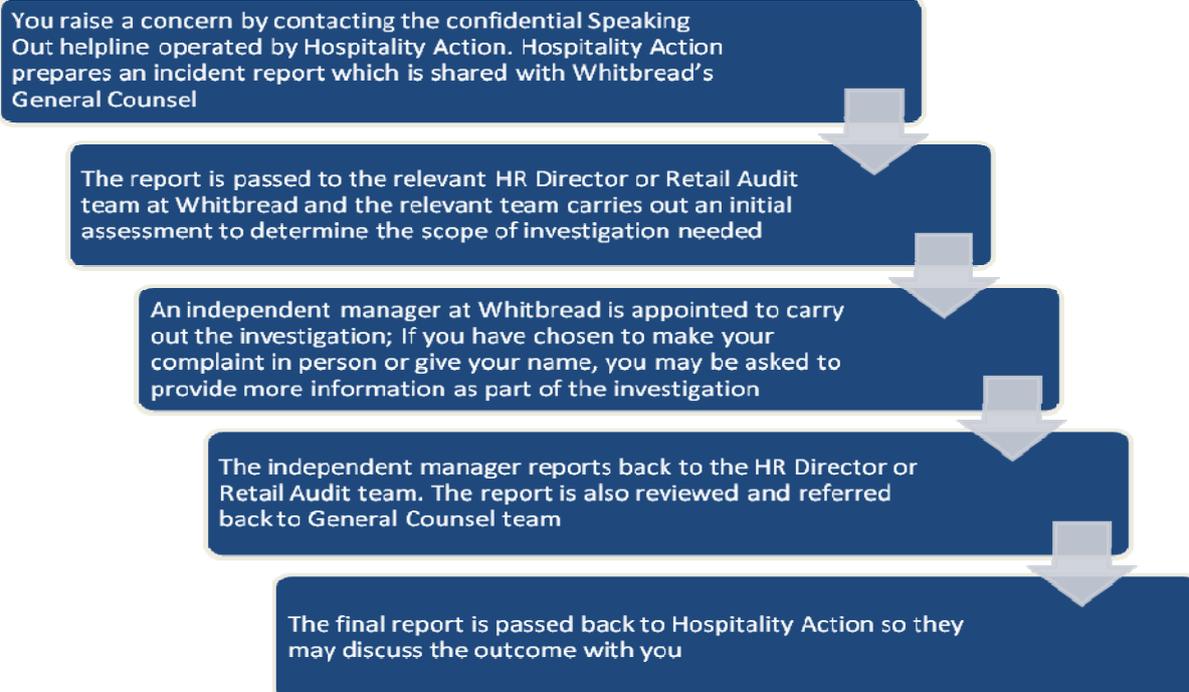
5. How your concerns will be investigated

If you raise a concern by calling the Speaking Out helpline, an incident report will be produced detailing the concerns that have been raised. This report is then sent to Whitbread's General Counsel (part of our legal team), who will then pass it on to the relevant HR Director or Retail Audit team, depending on the type of concern. This team will carry out an initial assessment to determine whether the report is Speaking Out or a grievance. If you have made your complaint in person, or you have given your details in your report, you may be asked to attend meetings in order to provide further information.

Next, an independent manager (who is not connected to the site or person who raised the concern) will be appointed to carry out an investigation, and report back to the HR Director or Audit team as appropriate. The investigation report is reviewed and then sent back to the General Counsel, who then passes the report back to Hospitality Action. They will then discuss the outcome of the investigation with you. At this point the case will be considered closed and you will not be given the right to appeal.

Throughout the process, we will make every effort to address your concern fairly and in the appropriate way. We will also aim to keep you informed about how the investigation is progressing and its likely timescale. However, sometimes the need for confidentiality may mean that we cannot share specific details about the investigation or any actions we take as a result. You should treat any information about the investigation as confidential.

What happens if you Speak Out



6. Speaking Out and confidentiality

We hope that you feel comfortable to speak out openly under this policy. However, we understand that if you decide to speak out, your situation might involve confidential or sensitive information. Therefore, you can choose to speak out anonymously, without giving your name or a way to contact you for more information. If this is the case, we will still aim to investigate your concerns fully, although it may be more difficult if we cannot obtain further information from you.

If you make a report through the Speaking Out helpline and ask to remain anonymous, then reasonable steps will be taken to protect your identity. However, we are unable to guarantee your anonymity, as you may be required to provide information which identifies you. If you speak out in confidence and ask to remain anonymous, then we will make sure that we do not disclose your name without your permission. However, there may be occasions where you need to provide other information that could identify you as the person speaking out.

7. Protection and support if you Speak Out

It is understandable that you may worry about possible negative consequences or repercussions of choosing to speak out. We aim to encourage openness. Under this policy, if you raise a genuine concern you will be protected from any unfair treatment such as dismissal, disciplinary action, threats or unfavourable treatment.

However, if we investigate a speaking out allegation and believe that you have raised a concern maliciously or for personal gain, we may investigate this matter in line with our [Disciplinary Policy](#), which could result in disciplinary action being taken against you.

8. Who to contact to Speak Out

If you do not feel comfortable talking to someone at work, you can contact our independent and confidential helpline 24 hours a day, 365 days a year. You don't have to leave your name, but you will be encouraged to do so if it will help us to resolve the problem.

You can contact the [Speaking Out helpline](#) via [Hospitality Action](#) on:

- Phone: [0808 801 0351](tel:08088010351)
- Email: assistance@hospitalityaction.org.uk
- Online: hospitalityaction.org.uk

You can also contact the [Public Concern at Work](#) independent whistle blowing charity on [0207 404 6609](tel:02074046609) or whistle@pcaw.org.uk.

9. The fine print

This Speaking Out policy should be used to disclose any suspected danger or wrongdoing. The success of this policy will depend on you using it.

This policy does not form part of your contract of employment, and we may amend it from time to time.

Any Speaking Out allegations concerning a Senior Executive or an Executive Director of the Company will be reported to Whitbread's General Counsel and the Chairman of the Audit Committee.