



Last Update: April 2026

Annington Limited
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Annington Limited, together with its subsidiaries and affiliates (“Annington”, the “Company”, “we”), is committed to acting with collaboratively and integrity in all our business dealings.

1. INTRODUCTION

1.1 Our Commitment

Annington Limited (“Annington”) is committed to maintaining the highest possible standards of openness, integrity and accountability in its activities.

In line with that commitment, we expect and encourage employees and all others who work for, with or on behalf of Annington, to come forward and raise any concerns they may have in relation to Annington or its activities.

1.2 Who does the Policy Apply to

This Whistleblowing Policy applies to all employees, officers, consultants, contractors, casual and temporary workers, agency workers, volunteers or those on work experience.

It also applies to any third party or external individual or entity who works for, with or on behalf of Annington, including (but not limited to) suppliers, service providers, agents, and intermediaries.

2. AIMS OF THE POLICY

This Whistleblowing Policy aims to:

- Encourage a culture of openness, accountability and integrity, and to support the early identification and escalation of concerns related to wrongdoing, misconduct or unethical behaviour connected with Annington’s business or activities or which could threaten customers, third parties or members of the public.
- Provide a clear and accessible process through which employees and all others within the scope of this Whistleblowing Policy can raise in confidence such concerns.
- Ensure that all concerns raised under this Whistleblowing Policy are taken seriously, assessed appropriately, with a timely response provided and, where appropriate, feedback given on any action taken.
- Reassure you that any person who raises concern under this Whistleblowing Policy, in good faith, will be protected from any form of retaliation, victimisation or other detrimental treatment as a result of doing so.

3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of actual or suspected malpractice, wrongdoing, misconduct, or dangerous or improper conduct in relation to Annington or its activities. The kinds of misconduct covered by **The latest version of this document is maintained on the Policy Documents Drive. Please check you are using the correct version.**

this Policy include:

- Criminal offences, including (but not limited to) those relating to bribery and corruption, fraud, facilitation of tax evasion and sanctions breaches.
- Failure to comply with a legal or professional obligation.
- Miscarriages of justice.
- Unethical behaviour, including actions which could damage Annington's reputation or which is inconsistent with Annington's values.
- Risks or harm to the health and safety of any individual, including employees, third parties and members of the public.
- Damage to the environment.
- Concerns related to modern slavery, forced labour or human trafficking.
- Deliberate attempted or actual concealment of information of any of the above.

In each of the above cases, the individual making the disclosure must believe that the relevant wrongdoing either has already occurred, or is occurring at the time of the disclosure, or is likely to occur at some point after the disclosure.

Other procedures are available to employees which relate to complaints about their own employment e.g. the Grievance Procedure. This Policy does not replace other corporate reporting procedures, e.g. the Financial Crime Policy.

4. SAFEGUARDS AND PROTECTION FROM DETRIMENTAL TREATMENT

Annington recognises that the decision to report a concern can be a difficult one to make. However, if you raise a concern in line with the principles and procedure set out in this Whistleblowing Policy, it will be taken seriously and handled appropriately.

Annington will not tolerate any form of detrimental treatment (including retaliation, informal pressure, harassment, or victimisation) against those who raise genuine concerns under this Whistleblowing Policy.

This principle applies equally if a person reports a genuine concern under this Whistleblowing Policy which turns out to be unfounded or mistaken.

Any attempt to discourage you from coming forward to express a concern under this Whistleblowing Policy will not be tolerated by Annington. Where such conduct is found to be carried out by an employee, it may result in disciplinary action. Where it is carried out by a third party, Annington will take appropriate action in accordance with the relevant contractual arrangements or legal obligations. If you believe that you have suffered any such treatment, you should inform Human Resources immediately or report via the channels set out in this Policy.

4.1 Confidentiality

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Although concerns can be raised anonymously, we encourage you to provide your name when raising a concern whenever possible. This is likely to assist us in effectively assessing and investigating the issues raised.

Please note that all concerns will be handled sensitively, and so far as reasonably practicable, treated in confidence. Unless the law requires otherwise, every effort will be made not to reveal your identity.

5. HOW TO RAISE A CONCERN AND WHAT WILL HAPPEN

As a first step, you should raise concerns using one of the reporting channels set out below. The appropriate route may depend on the seriousness and sensitivity of the issues involved, who is suspected of wrongdoing and whether you are an employee or an external party.

Employees may raise concerns internally with their immediate manager. Where this is not appropriate (for example, if you believe that your manager is involved), you should instead approach their manager or a Director. If you suspect financial or accounting irregularities, then you should contact the Chief Financial Officer or alternatively the Chief Executive Officer.

Individuals who are not employees, or do not have access to these internal reporting lines may raise concerns using the alternative reporting channels set out below.

A concern can be raised verbally (for example, by telephone to our dedicated Whistleblowing line on 0207 960 7510), or in writing at legalteam@annington.co.uk or to our Legal Team at the Head Office at Hays Lane House, 1 Hays Lane, London, SE1 2HB, United Kingdom.

Any whistleblowing concerns raised to employees by third parties should be referred to the Legal Team.

When reporting a concern, you are encouraged to provide as much relevant information as possible, including the nature of the concern, when and where the issue occurred, who was involved, whether the issue is on-going or requires urgent attention, and any other supporting information you think may be relevant. You are not expected to have all the answers or prove your concern, but in general, the more information and the more specific information you can provide, the easier it may be for Annington to assess and investigate the matter accordingly.

You should not attempt to investigate concerns yourself and should allow Annington to investigate the matter.

We understand that it can be difficult to report a concern, particularly one which may relate to unlawful or improper conduct. However, you are encouraged to come forward with any concerns at the earliest opportunity, so that matters can be addressed promptly and effectively.

We strongly encourage you to use this Whistleblowing Policy as a means of reporting any concerns to Annington, where you will benefit from the protections set out in this Policy, where concerns are raised in **The latest version of this document is maintained on the Policy Documents Drive. Please check you are using the correct version.**

good faith.

However, nothing in this Policy is intended to prevent you from reporting a concern to a regulator or an appropriate external body. The law recognises that in certain circumstances it can be appropriate to report concerns externally, if you feel that you cannot raise your concern internally. In these circumstances, it may be appropriate to raise the matter with another prescribed person. A list of prescribed people and bodies for this purpose is available on the GOV.UK website at www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2. You should be aware that raising concerns externally or publicly (including with the media) may impact any statutory whistleblowing protections available, and are encouraged to seek independent advice before doing so. Protect (formerly known as Public Concern at Work) is the UK's whistleblowing charity and aims to stop harm by encouraging safe whistleblowing. It is a source of further information and advice.

Where you report a concern under this Whistleblowing Policy, Annington will appoint an appropriate individual to assess and where necessary investigate the matter, and where applicable, report to the Board. Where appropriate, Annington will provide feedback on the progress or outcome of an investigation to you. If wrongdoing is identified, appropriate action will be taken.

DOCUMENT VERSION

Policy Number	ANN-POL-019	Version No	V.1.7
Effective Date	June 2010	Last Reviewed	April 2029
Policy Owner	Sarah Jury, Head of Legal	Policy Approved By	Annington Ltd Board

Internal Compliance Version Only
VERSION HISTORY

VERSION	AUTHOR	REVISION DATE	CHANGES
V.1.0	HR	June 2010	Whistleblowing Public Interest Disclosure Act
V.1.1	HR	January 2011	Minor amendments
V.1.2	HR	June 2011	Inserted Northgate's contact details
V.1.3	Chief of Operations	August 2017	Whistleblowing Policy consolidation with Employee Handbook
V.1.4	Holly Miller, Director of Strategy and Communications	May 2019	Removed MoorePay and NGA. Aligned with language in Employee Handbook to reflect UK law of 2013.
V.1.5	Sarah Jury, Head of Legal and Holly Miller, Director of Strategy and Communications	March 2022	Amendments suggested by Eversheds Sutherlands LLP.
V.1.6	Nicola Lynn, Compliance Manager	June 2024	Reference to Financial Crime Policy added.
V.1.7	Sarah Jury, Head of Legal	April 2026	Reviewed and added reference to telephone line and legal team and clarified the Policy applies to externals.

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