



# **Bundy Refrigeration**

## **WHISTLEBLOWING POLICY**

BRG-COMP-POL-003-02

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INITIAL ISSUE DATE – 1ST MAY 2021

LATEST REVISION DATE – DECEMBER 2023



**BUNDY**  
REFRIGERATION

# WHISTLEBLOWING POLICY

We are Bundy. The name behind the world's leading refrigeration appliances.

## Purpose

All organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. Bundy Group is committed to doing business with honesty and integrity and encouraging openness and accountability. Employees are often the first to realise that there is something wrong within the organisation however they may feel that speaking up would be disloyal to their colleagues or to the business itself. Bundy Group believes its employees should feel free to report any incidents of malpractice or suspected wrongdoing without fear of suffering retribution provided any such reports are based on genuine concerns and are without malice or made in bad faith. All employees of Bundy Group are encouraged to raise genuine concerns about possible improprieties in the conduct of our business at the earliest opportunity.

## Scope

This policy applies to all employees, contractors and wholly and majority-owned subsidiaries of Bundy Group.

This policy has been approved by the CEO and relates to any suspected malpractice and wrongdoing concerning matters such as;

- Financial impropriety and fraud.
- Failure to comply with legal or regulatory obligations such as health and safety obligations.
- Criminal offences e.g. theft.
- Bribery and corruption.
- Breaches of Bundy Group's Business Ethics and Conduct Policy.
- Breaches of Bundy Group's Related Party Policy.
- Actions that are intended to conceal any of the above.

## Principles

The following principles apply to the operation of this policy:

- All concerns raised will be treated fairly and properly.
- Bundy Group operates a zero-tolerance policy to any form of retaliation against anyone raising a genuine concern.
- If you have a reasonable belief that something inappropriate has happened and you act in good faith in making a disclosure, you will be protected. This assurance does not extend to someone who maliciously raises a matter they know is untrue.
- Anyone making a disclosure will retain their anonymity unless they agree otherwise however, please be aware that the ability to investigate anonymous disclosures will be limited.

## Process

If any employee believes reasonably and in good faith that improprieties exist in the workplace, then he or she should report them immediately to their line manager.

However, if for any reason you do not wish to raise your concerns through your normal line manager, you should report your concerns to a more senior manager or the senior HR representative in your location.

The concern should be made orally or in writing, describing the incident(s) as fully as possible. All concerns raised will be viewed seriously and treated as confidential.

Provided there is sufficient evidence to support the allegation/concern, a full investigation will be conducted to establish whether malpractice has occurred.

Employees who have raised a concern will be informed of who is handling the matter and how they can be contacted.

The Bundy Group will carry out an initial review of the information received and will then determine what the most appropriate course of action is. We will contact you following our initial review and update you about the next stages of the process.

We will give as much feedback as we can without any infringement on the duty of confidence owed by us to someone else. Employees' identities will not be disclosed without prior consent.

Where concerns cannot be resolved without revealing the identity of the employee raising the concern, we will enter into dialogue with the employee concerned in the first instance to discuss whether and how we can proceed.

Anyone who retaliates against a whistle-blower (who reported in good faith) will be subject to formal disciplinary action.

Alternatively, you can raise your concerns through [ethics@bundyrefrigeration.com](mailto:ethics@bundyrefrigeration.com)

## Bundy Italy - Whistleblowing Procedure

The Italian Authorities have introduced a specific Whistleblowing Decree in order to comply with the European Directive on Whistleblowing. This requires organisations under Italian Jurisdiction to have a separate reporting Tool for Whistleblowing Reports to be made.

You will find the Tool and information about the Italian-specific process required here:

<https://bundyrefrigeration.wallbreakers.it>

## Contact

Any queries concerning this policy should be directed to your line manager and/or HR department.