

SPEAK UP WHISTLEBLOWER POLICY

Purpose of this policy – Why it matters

C&C Group plc (the “**Group**”) is committed to doing business in accordance with all applicable laws and regulations and our Code of Conduct (the “**Code**”). We encourage whistleblowing as it plays an important role in achieving this commitment and is part of an open, honest and transparent, values based culture.

This policy sets out how colleagues can report concerns regarding wrongdoing or potential wrongdoing.

Scope

This policy applies to all colleagues, whether employed on a permanent or temporary basis. It also applies to consultants, contractors, agency staff, shareholders, members of administrative, management or supervisory bodies, volunteers, interns, job applicants and casual workers in relation to their work for, or on behalf of any Group company. For 50% owned joint ventures, partners are also expected to put in place policies consistent with this policy.

Policy

It is our policy to encourage colleagues to report genuine issues or concerns about wrongdoing. Any colleague who raises their concerns will be supported for doing so and will be protected from retaliation.

Raising your concerns

If you have any concerns about any conduct that you believe or suspect might be a breach of any applicable laws, this Code or any of our policies you must report it as soon as possible. The improper conduct may have occurred in the past, be currently occurring or be likely to occur.

This policy should not be used for interpersonal grievances that exclusively affect you, namely, grievances about interpersonal conflicts between you and another individual, or a matter concerning a complaint by you to, or about the Group which exclusively concerns you. In those cases you should use the Grievance Procedure or Group Diversity, Wellbeing and Inclusion Policy as appropriate.

A **non-exhaustive list** of concerns that this Policy is intended to cover include:

- That an offence has been, is being or is likely to be committed;
- That a person has failed, is failing or is likely to fail to comply with any legal obligation;
- That a miscarriage of justice has occurred, is occurring or is likely to occur;
- That the health and safety of any individual has been, is being or is likely to be endangered; and / or
- That the environment has been, is being or is likely to be damaged.

Who should you speak to?

- Your line manager is the person you should speak to first – unless you think they have breached the Code;
- If you cannot speak to your line manager, you should speak to the HR Advice team (hradvice@candcgroup.ie), or a member of the Legal Department;
- If you need to raise your concern in complete confidence, you can do so via Vault.

We will acknowledge your concern in writing within seven days.

Report via the Vault App:

Download the app.

a. Apple App Store: <https://apps.apple.com/us/app/vault-platform/id1444463273>

b.

Google: https://play.google.com/store/apps/details?id=com.vaultplatform.app&hl=en_US

Report via the Vault Online Platform:



Vault allows individuals to report any concerns directly, is completely confidential and run by an independent company for the Group.

We appreciate some individuals may wish to report concerns anonymously and Vault allows individuals to do this. However, we do not encourage you to raise your concern anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. For those reasons, we might not accept or follow-up on an anonymous concern. If you are concerned about possible penalization or reprisals if your identity is revealed, you should come forward to the HR Advice team (hradvice@candcgroup.ie) or a member of the Legal Department and appropriate measures can then be taken to preserve confidentiality.

Investigation of concerns

All concerns raised will be treated seriously and each case will be considered on its own facts.

Any concerns will be assessed on a confidential basis by a designated impartial person (the “**Designated Impartial Person**”), who will be one of the following, the Human Resources Department, or the Company Secretary and Group General Counsel. The Designated Impartial Person will carry out an initial assessment to determine the scope of the whistleblowing concern and next steps. You may be required to attend additional meetings in order to provide further information. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your concern and any subsequent investigation.

If, following the initial assessment, it is decided that there is evidence supporting your concern, the Designated Impartial Person will take appropriate follow up action to address the concern. The follow up may include an internal inquiry or an investigation.

If, following the initial assessment, it is decided that there is no evidence supporting your concern, the Designated Impartial Person may close your concern or refer the matter to other internal policies and procedures. We will notify you as soon as possible in writing of our decision and will outline our reasons for closing your concern.

If we conclude that you have made false allegations maliciously, you may be subject to disciplinary action.

The Designated Impartial Person will provide you with feedback within a reasonable period, and in any case, within 3 months from the date that your concern was acknowledged. You can make a request to us in writing if you would like us to provide you with further feedback at intervals of 3 months until the procedure relating to your concern is closed. An official written record will be kept at each stage of the procedure.

If you make a disclosure, we will process any personal data collected in accordance with our employee Data Protection Policy. Data collected from the point at which you make the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Non-retaliation

Please feel confident that no one will be penalised for raising concerns in good faith about suspected misconduct. Any form of retaliation against you for raising a concern will not be tolerated. Retaliation against reporters is treated as a violation of the Code and consequently may lead to disciplinary action up to and including dismissal.

Outcome of the investigation

In the event you are not satisfied with the outcome of the investigation, you may take the complaint or concern to the Chair of the Company's Audit Committee by email to john.gibney@candcgroup.com.