



## **SPEAK UP POLICY**

### **Bunzl plc and its subsidiaries ('Bunzl' or 'the Group')**

#### **Policy statement**

We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards. We expect our employees to speak up and make management aware of all failures to adhere to the standards set out in the Business code of conduct ('Code'); the Fraud policy and the Anti Bribery and Corruption policy and any non-compliance with the law and/or company policies including the Code or any irregularities relating to accounting, internal controls and auditing matters. The details of any concerns reported should be done so honestly, accurately and without malice and can, if desired, be reported on a confidential or anonymous basis.

Employees should be satisfied that, in making a disclosure, they are acting in good faith and genuinely believe that the information and allegations are substantially true in which case the employee shall receive no retaliation or retribution for such a report. We will respect the wishes of employees raising concerns if they ask for anonymity or confidentiality but we cannot always guarantee this as we may need to act to protect our employees, clients and businesses. Appropriate steps will be taken to ensure that the working environment and/or working relationship are not prejudiced as a result of the disclosure.

We reserve the right to utilise the full range of disciplinary actions against any employee who acts or attempts to act in a way prejudicial to an employee who has made a disclosure using this process. We reserve the right to deal with malicious or false allegations made under this process through the appropriate local disciplinary procedure.

#### **Application of the policy**

##### **Informing and training employees**

Businesses should ensure that all employees are aware of the Speak Up process. This includes ensuring that Speak Up posters are displayed on the notice board in each facility including information on how to report matters confidentially and anonymously.

Businesses should ensure that all management employees, including managers and procurement and sales executives, complete the Corporate Responsibility ('CR') training module on the Speak Up process at least once every three years.

##### **The 'Speak Up' process**

In the first instance, any concerns should be raised with the employee's line manager, director in charge or any other senior person within Bunzl with whom the employee feels comfortable. They will either act on the information or pass it to the relevant person to handle the matter.

The local recipient to whom the concern has been raised will make appropriate initial enquiries and carry out an initial assessment of how to proceed. The employee that raised a concern may, as part of this initial assessment, be asked to attend a meeting to explain their concerns. The initial assessment may lead to a formal investigation which, depending on what is found, will determine the action to be taken and the timescales involved. If they wish and if the report

was not anonymous, the employee will be kept up to date on the outcome of any enquiries and investigations carried out and any actions taken.

Local management will report issues that have been handled locally to the Director of Group HR.

If the matter is not dealt with in a manner that the employee feels is appropriate, or the employee feels it is not possible to discuss the matter openly for any reason, the matter should be reported through the dedicated anonymous 'Speak Up' process. Full details of how to do this are displayed in each facility. This process is managed by an external provider to ensure independence from Bunzl and provide employees greater confidence that their anonymity is protected if this is requested. Employees can raise concerns via a free phone telephone number (the numbers are specific to the country and the UK number is 0800 0773031) or through a weblink - [bunzl.ethicspoint.com](https://bunzl.ethicspoint.com). All employees are given a reference number which enables them to get feedback on the matters raised via the system and retain their anonymity.

The Director of Group HR will ensure that appropriate action is taken regarding reported issues, will record all reported incidents and report them to the Head of Internal Audit. A senior HR professional will review the issue reported and carry out an investigation to establish the details of the issue raised. If fraudulent or inappropriate behaviours are evidenced, actions will be taken. These actions will vary depending on the severity of the incident and include but are not limited to using internal disciplinary processes and seeking the involvement of external enforcement bodies when necessary.

Issues that the Speak Up process should be used to report upon include, but are not limited to, acts of bribery, corruption and fraud and these can be in relation to other employees, customers or suppliers. Any issues (including those handled within the business areas), relating to accounting, internal controls and auditing matters should be referred to the Head of Internal Audit at the same time as they are reported through the Speak Up process.

### **Policy ownership and monitoring**

The Speak Up policy is owned by the Director of Group HR. The policy will be formally reviewed by the Board of Bunzl plc every year.

The responsibility for the implementation, communication and maintenance of the Speak Up policy is directed by the Group HR function through the business areas.

Implementation of the Skill Pill training will be monitored annually by the Group HR function.

The Director of Group HR will report to the Bunzl plc Board a summary of the material matters reported through the Speak Up process, normally twice per year.

**2 January 2023**