

YOUR CONCERN  
IS OUR CONCERN

## Talk to us via

### Telephone

0808-189-1053

### Online

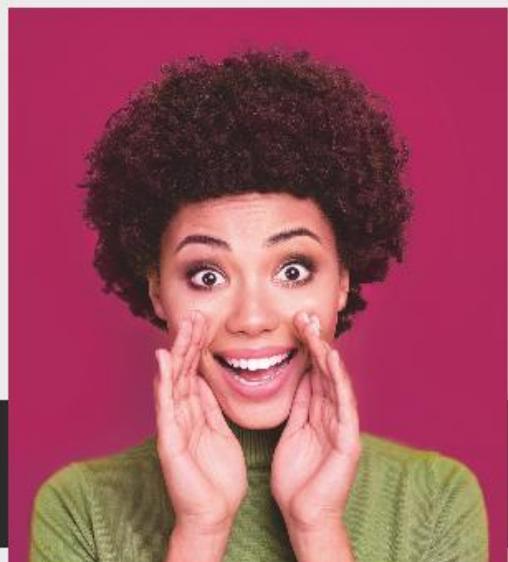
[www.britvic.com/myspeakup](http://www.britvic.com/myspeakup)

### Email

[speakup@britvic.com](mailto:speakup@britvic.com)

If you have concerns that any of our policies are being breached or anyone is acting improperly, you can use our independent & confidential hotline and we'll look into it.

**BRITVIC**  
best drinks





# Speak Up Policy

## 1. Policy Statement

**“Every day, each and every one of us has a personal accountability to do the right thing, to act responsibly, follow the law and treat others with respect.”**

***Simon Litherland, Britvic Code of Conduct***

At Britvic we have a culture of honesty and openness. Our values support the highest standards of integrity and responsibility in everything we do. Together we stand up for what is right.

We expect all staff to maintain high standards in accordance with our policies and procedures. However, all organisations face the risk that standards may be wilfully or negligently disregarded, or of unknowingly harbouring illegal or unethical conduct. Your action could prevent wrongdoing which could damage Britvic’s reputation or performance and could even save people from harm.

**Events presenting an immediate threat to life or property or that constitute an emergency should be reported to the appropriate emergency services.**

## 2. Policy Owner

The policy owner is the General Counsel / Company Secretary. If you have any questions about the policy please email [speakup@britvic.com](mailto:speakup@britvic.com).

## 3. Who does it apply to?

This Code applies to anyone working for or on behalf of Britvic in any capacity (including secondees, contractors and agency workers) in any country across the world, and also to any person with whom Britvic has, or has had, a business relationship with such as agents, advisors distributors, suppliers and customers.

The mySpeakup service is available to all, within Britvic and outside the company, who wish to raise a concern related to Britvic’s business activities.

## 4. Policy Detail - What do I need to know or do?

**If you witness or suspect any wrongdoing at work, no matter how senior those concerned or in which area of our business, please report it.**

### What kind of things should I speak up about?

We want you to speak up about any concern about wrongdoing that could affect Britvic, its people, the communities and environment we work in.

Concerns related to harassment, bullying or personal grievances should be reported to your HR Business Partner. Refer to your local policies for further advice.

Concerns may relate to actual or suspected wrongdoing in the past, present or potentially in the future, which may include:

- Anything that is against the law, such as stealing or fraud
- Breaches of any of Britvic's policies
- Corrupt or dishonest activity
- Unethical or immoral behaviour
- Damage to the environment
- Abuse of authority
- Endangering someone's health and safety
- Quality issues which may cause serious health effects to consumers
- Quality or environmental issues which may lead to significant brand damage
- Financial fraud or mismanagement
- Unauthorised disclosure of confidential information
- Deliberate concealment of any of the above

## How do I speak up about something?

- You are encouraged to report your concerns to your line manager in the first instance. If your manager is involved in the improper behaviour, or you feel uncomfortable speaking to them about it, you should use the mySpeakup confidential hotline.

**mySpeakup** is an independent confidential hotline that you can use (toll free) 24 hours a day, 7 days a week from any location in the world to report any concern in confidence.



Go to [www.britvic.com/speakup](http://www.britvic.com/speakup) to report your concern via the website.



You can report your concern by phone. Numbers for our key locations are shown

UK	0808 189 1053
Ireland	1800 904 177
France	0805 080 339
Brazil	0 800 892 2299
Netherlands	0800 022 0441
USA	800 461 9330



You can also email your concerns to [speakup@britvic.com](mailto:speakup@britvic.com).

- You are encouraged to provide as much information as possible, including names, dates, places, and details of the events that took place, or that you believe are likely to take place. You do not need to provide evidence in order for us to investigate the concerns raised.
- You may report a matter anonymously, but we would encourage you to go on the record, as your identity will be protected by our processes. Our ability to ask follow-up questions, investigate thoroughly and provide feedback may be limited if we cannot contact you. If you choose to remain anonymous your concerns will still be investigated as thoroughly as possible. You may request feedback through a telephone appointment or anonymised email address.
- You can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken. If you raised a concern in good faith, which is not confirmed by subsequent investigation, no action will be taken.

## What will Britvic do?

- Your concerns will be taken seriously and investigated as appropriate. All disclosures will be treated with absolute confidence and your details will not be disclosed unless there is a legal obligation to do so. The Company Secretary or the Director of Audit & Risk will lead the investigation and your details will not be given to any others investigating the matter without your consent unless absolutely necessary.
- You may be asked to attend meetings or agree to be contacted by telephone to talk through your concern further and get as much detail as possible.
- Britvic will abide by any local laws and regulations related to whistleblowing in the country where the concern is raised.
- Britvic is committed to treating all disclosures consistently and fairly and to ensuring that anyone raising a concern in good faith is protected from victimisation. Any instances of victimisation will be taken seriously and managed appropriately. If a person who has raised a concern in good faith is subsequently victimised, the perpetrator of the victimisation may be subject to internal disciplinary procedures.
- Investigations will be carried out as quickly as possible but may take some time depending on the nature of the concern. If the investigation is prolonged, you will be kept up to date on what is happening.
- The Britvic plc Board will receive an anonymised summary of any concern reported and monitor management actions to resolve the matter.
- You will be told the outcome of any investigation into your concern unless there is a legal reason why we can't share this with you. Due to the often-sensitive nature of a concern at work you may be told the outcome in confidence, which should not be shared.
- If a breach of any Britvic company policy or the law is uncovered, any employee or supplier who knew, or could reasonably be expected to have known of the breach, and didn't report it, may be subject to internal disciplinary procedures or other actions by regulatory bodies or the courts.
- If a concern is raised in good faith, which is not confirmed by subsequent investigation, no action will be taken against the person who raised the concern. If, however, an employee or supplier makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

## 6. Related Documents

[Code of Conduct](#)

[Ethical Business Policy](#)

[Anti-Bribery and Corruption Policy](#)

[Grievance Policy \(GB\)](#)

[Grievance Policy \(IOI\)](#)

[Harassment and Bullying Policy \(GB\)](#)

[Dignity and Respect at Work \(ROI\)](#)

## 7. FAQs

What should I do if I'm a line manager and someone reports a concern to me?

If you're a line manager who receives a report of improper conduct you should maintain absolute confidentiality between yourself and the person making the report. Do not contact the subject of the report. Listen without judgment, and thoroughly and clearly document all of the facts available: person(s) involved, details of concern, evidence, dates, etc. You should then act immediately to contact the Director of Audit and Risk, or the Company Secretary or email [speakup@britvic.com](mailto:speakup@britvic.com) for further assistance.

What should I do if I want to report a concern but I don't work for Britvic?

You can use the [mySpeakup](#) service even if you don't work for Britvic. We will treat all concerns with equal consideration and maintain confidentiality throughout.

What should I do if I've reported a concern but I'm not satisfied with the outcome?

You may request that the matter is referred to the Managing Director of the business unit in which you work, or to Britvic's Chief Executive Office. If you're still not satisfied, you may have the option to raise the matter with the relevant external authority. This may depend on the country your work in – refer to the country specific information below.

## UK employees only

The following applies to anyone with an employment contract with a UK company, including Britvic Soft Drinks Ltd, Britvic Northern Ireland Ltd and Britvic EMEA Ltd.

### What legal protection do I have against victimisation?

The Public Interest Disclosure Act 1998 (PIDA) provides statutory protection from victimisation, provided that the disclosure is in the public interest and fall under the definition of a “protected disclosure”. The person making the disclosure must reasonably believe that it tends to show past, present or likely future wrongdoing in one or more of the following categories:

- Criminal offences
- Failure to comply with an obligation set out in law (UK law or otherwise)
- Miscarriages of justice
- Damage to the environment
- Endangering someone's health and safety
- Covering up wrongdoing or deliberate concealment of any of the above

### Can I raise my concern outside the company instead?

This policy and the associated procedures provide a robust mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. There are however mechanisms in place for external disclosures should that become required. You can report your concerns to a “prescribed person” without losing your legal protections under PIDA.

A full list of prescribed persons can be found at:

[www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies](http://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies)

We strongly advise you to seek advice before reporting a concern outside the company. It will rarely, if ever, be appropriate to raise a whistleblowing concern directly to the media. You should never tell the media about any concern already being investigated. If you report your concern to the media, in most cases, you will lose your legal protections under the PIDA.

## Where can I get further advice about reporting a concern?

The independent whistleblowing charity, Protect, operates a confidential hotline and offers free, independent and confidential advice, for example regarding what is protected by PIDA. You can find out more at:

[www.protect-advice.org.uk](http://www.protect-advice.org.uk)

or call their hotline number in the UK on 020 3117 2520.

You can read general advice from the UK government at:

[www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)

You can read advice from the Advisory, Conciliation and Arbitration Service (ACAS) at

[www.acas.org.uk](http://www.acas.org.uk)

## ROI employees only

The following applies to anyone with an employment contract with an ROI company, including Britvic Ireland Ltd, Counterpoint and Aquaporte.

## What legal protection do I have against victimisation?

The Protected Disclosures Act 2014 (PDA) aims to protect people who raise concerns about possible wrongdoing in the workplace. It provides for redress for employees who are dismissed or otherwise penalised for having reported possible wrongdoing in the workplace.

Under the PDA, you make a protected disclosure if you are a worker and you disclose relevant information in a particular way. Information is relevant if it came to your attention in connection with your work and you reasonably believe that it tends to show wrongdoing.

Wrongdoing is widely defined in the Act and includes:

- Commission of criminal offences
- Failure to comply with legal obligations
- Endangering the health and safety of individuals
- Damaging the environment
- Miscarriage of justice, misuse of public funds

- Oppressive, discriminatory, grossly negligent or grossly mismanaged acts or omissions by a public body
- Concealment or destruction of information about any of the above wrongdoing

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A full list of prescribed persons can be found at:

<https://www.gov.ie/en/collection/41798-protected-disclosures-whistleblowing-list-of-prescribed-persons/>

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## Where can I get further advice about reporting a concern?

The Transparency Legal Advice Centre (TLAC), provides free legal advice to anyone who wishes to disclose wrongdoing, particularly under the Protected Disclosures Act. You can find more at

<https://transparency.ie/helpline>

or call their speak up number on 1800 844 866.

You can read general advice from Citizens Information at:

[https://www.citizensinformation.ie/en/employment/enforcement\\_and\\_redress/protection\\_for\\_whistleblowers](https://www.citizensinformation.ie/en/employment/enforcement_and_redress/protection_for_whistleblowers)

You can read advice from the Workplace Relations Commission (WRC) at

[https://www.workplacerelations.ie/en/what\\_you\\_should\\_know/employer-obligations/protection-of-whistleblowers/](https://www.workplacerelations.ie/en/what_you_should_know/employer-obligations/protection-of-whistleblowers/)