

WHISTLEBLOWING POLICY

1. Purpose

The purpose of this Policy is to:

- provide employees with guidance on Whistleblowing and the legal protections for Whistleblowers and
- encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

2. Background

The Public Interest Disclosure Act 1988 (“PIDA”) encourages certain disclosures of information in the public interest by providing protection against victimisation or dismissal for employees or service contractors who follow the procedures in disclosing specific categories of illegal or criminal behaviour within their organisation.

“**Whistleblowing**” is when an employee or worker raises a genuine concern about suspected illegal or criminal behaviour at his or her workplace.

3. Scope

This Policy covers all employees, officers and agency workers employed by The Restaurant Group plc and its subsidiaries (“TRG” or the “Group”). This Policy does not form part of any employee’s contract of employment and we may amend it at any time.

4. Policy

TRG is committed to conducting its business with honesty and integrity, in accordance with legal requirements, and we expect all employees to maintain high standards of behaviour, as further explained in the Group Employee Handbook.

It is in the Group’s interests for employees to feel they can promptly raise any suspected illegal or criminal activity through the right channels, without fear of being treated unfairly or losing their jobs, so that it can be investigated and dealt with effectively.

4.1. What counts as Whistleblowing under the law?

To be protected, you must raise a **genuine** concern about any of the following within TRG:

- a criminal offence (e.g. bribery or fraud)
- someone’s health and safety is in danger
- a risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law or
- someone is deliberately covering up one of the above.

4.2. What types of concerns are not protected as Whistleblowing?

This Policy should not be used:

- for **grievances** relating to the way you have been treated at work. In those cases you should use the Group Grievance Procedure.
- to deal with suggestions for **improvements in our procedures** or processes, or our business activities, which do not involve suspected illegal or criminal activity as described in paragraph 4.1 above.
- if an employee’s concern is not genuine – for example, if he or she is seeking to engineer a claim to protect himself or herself or seeking to use the PIDA to obtain or improve a settlement.

If you are uncertain whether something is within the scope of this Policy you should seek advice from the HR Director or the Company Secretary, whose contact details are at the end of this Policy.

4.3. Confidentiality

We hope that all employees will feel able to voice Whistleblowing concerns openly under this Policy. However, if you want to raise your concern confidentially, we will make reasonable efforts to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage anonymous disclosures. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. In addition, you may not obtain the Whistleblowing protections under the law if you raise a concern anonymously.

4. Policy continued

4.4. Protection and Support for Whistleblowers

We aim to encourage openness and will support employees who raise genuine concerns under this Policy. Whistleblowers must not suffer any detrimental treatment such as dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

5. PROCEDURE: HOW TO RAISE A WHISTLEBLOWING CONCERN

- 5.1. (a) We hope that in many cases you will be able to raise any concerns with your line manager, operations manager or departmental head. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.
- (b) However, where the matter is more serious, or you prefer not to raise it with them for any reason, you should contact the HR Director.
- (c) If or you prefer not to raise it for any reason with the HR Director, you should contact the Company Secretary by writing to whistleblowing@trgplc.com.
- 5.2. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be asked to attend meetings in order to provide further information.
- 5.3. In some cases we may appoint an investigator or team of investigators including those with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 5.4. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

6. EXTERNAL DISCLOSURES

In most cases you should not find it necessary to alert anyone externally and your terms and conditions of employment require that you do not disclose confidential information to third parties. However, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as the Police. **We strongly encourage you to seek advice before reporting a concern to anyone external.** The independent Whistleblowing charity, *"Protect"* (formerly *Public Concern at Work*) provides free, confidential advice: Helpline: (020) 7404 6609, E-mail: whistle@pcaw.co.uk, Website: www.pcaw.co.uk.