

WHISTLEBLOWING POLICY – BAIRD GROUP (MARCH 2023)

Introduction

Baird Group aims to conduct its business with integrity, honesty and in accordance with the highest standards. However, like any organisation, Baird is aware that there is a risk of wrongdoing or malpractice occurring, from time to time.

Encouraging a culture of openness is important to us and we encourage our employees and those with whom we do business to raise any concerns they may have in relation to any wrongdoing or malpractice. This policy establishes the means to notify us about any such concerns.

If there is any practice or behaviour that you reasonably consider constitutes unlawful activity that we should know about, please use the procedure set out in this policy document. The reporting of genuine concerns will not adversely affect your employment or business relationship with Baird.

POLICY & PROCEDURES

Baird's guarantee

Anyone raising a genuine concern using the process set out in this policy document will not under any circumstances suffer any form of detriment or disadvantage as a result of having raised their concern.

All concerns properly raised under this policy will be treated seriously and in confidence. Unless required to do so as a matter of law, Baird will not disclose any information, other than in accordance with the terms of this policy, without the prior consent of the person who raised the concern.

WHO DOES THE POLICY APPLY TO?

This policy is designed to provide guidance to directors, employees, suppliers and contractors, who may, from time to time, feel that they need to raise certain issues relating to Baird with someone in confidence.

Employees should be aware that this policy is separate and distinct from the Grievance Procedure. If you have a complaint about your own personal circumstances you should use the grievance procedure which can be found in our Employee handbooks.

The Whistleblowing process should be used only to raise concerns about malpractice or wrongdoing within Baird.

TYPES OF INAPPROPRIATE ACTIVITY COVERED BY THIS WHISTLEBLOWING POLICY

This policy will apply in cases where you genuinely and in good faith believe that one of the following sets of circumstances is occurring, has occurred or may occur within Baird and that it is in the public interest for such circumstances to be disclosed:

- financial or accounting fraud, corruption, bribery or other financial impropriety;
- significant deficiencies or material weaknesses in the group's system of internal controls or any other significant weakness related to auditing or accounting matters which may have a material effect on the group's financial statements;

- the improper use of confidential or commercially sensitive information;
- the improper use of insider information for dealing in the shares of any company whose shares are listed on a recognised stock exchange;
- the failure to disclose information or the destruction of documents which should be disclosed to others in the group or any applicable regulatory body;
- a criminal offence or a failure to comply with legal obligations;
- the health and safety of any individual has been, is being or is likely to be endangered;
- a failure to comply with the Baird Group's policies, procedures or internal controls; or
- the deliberate concealment of information relating to any of the above.

REPORTING PROCEDURES

Any person concerned about wrongdoing or malpractice involving or relating to Baird or its dealings with customers, suppliers or business partners should follow the procedure set out below.

Baird Group Employees

Stage 1 - Tell your immediate supervisor or line manager

You should raise any concern with your immediate supervisor/line manager in the first instance.

If your supervisor/line manager is not contactable, your concern relates to him/her, or it is inappropriate to involve him/her for some other reason, you should go directly to stage 2 in the escalation process.

Stage 2 – Either email or contact any of the Whistleblowing Officers below via the e-mail address whistleblowing@baird-group.co.uk , all matters will be dealt with in confidence, additional contact details;

HR Director Paul Thompson paul.thomposn@baird-group.co.uk

Sourcing & Sustainability Manager Gemma Goodacre gemma.goodacre@baird-group.co.uk

Group Finance Director Nick Bycroft nick.bycroft@baird-group.co.uk

All the above can also be contacted at; Baird Group Head Office, 2100 Century Way, Leeds, LS15 8ZB

All correspondence should be marked **'Strictly private and confidential - to be read by addressee only'**.

Stage 3 – If you are still concerned

If you have raised your concern via stage 1 and/or 2 of the process but are not satisfied that it has been addressed adequately, or you believe that the matter is so serious that it cannot be raised through these stages, you should raise it in writing directly with Mark Cotter, Chief Executive mark.cotter@baird-group.co.uk

Persons other than Baird Employees

Please follow the process from stage 2 as described above for Baird employees.

Dealing with a concern

If a concern is raised at any stage of the above, the following commitments will be made;

The concern will be acknowledged within 5 working days by the recipient and a meeting arranged with the employee/person as soon as practicably possible but no longer than 10 working days after the concern has been raised. You are entitled to bring a colleague to this meeting but that colleague must respect the confidentiality of the process.

A full investigation will be carried out; actions and feedback reported within 3 months of the initial concern.

Raising Concerns Anonymously

You may raise your concern anonymously and can do so by writing to the above address to one of the listed Whistleblower Officers , however please make sure you detail clearly what your concern is so that the matter can be investigated by the most appropriate person.

For any queries about this policy please contact Paul Thompson, HR Director paul.thompson@baird-group.co.uk