

MARSTON'S TRADING LIMITED
EMPLOYEE POLICIES & PROCEDURES

"WHISTLEBLOWING" (PUBLIC INTEREST DISCLOSURE) POLICY

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Policy Statement

Marston's PLC at all times conducts its business with the highest standards of integrity and honesty. It expects all employees to maintain the same standards in everything they do. Employees are therefore encouraged to report any wrongdoing by Marston's PLC or its employees which falls short of these business principals.

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace and it is the aim of this policy to ensure that as far as possible employees are able to report any wrongdoing at work which they believe has occurred or is likely to occur.

It is recognised that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that Marston's PLC itself is responsible for the wrongdoing. The aim of this policy is to ensure that all employees are confident that they can raise any matter which concerns them in the knowledge that this will be taken seriously, treated as confidential and that no action will be taken against them.

All employees are encouraged to use the procedure set out below if they have any concerns about wrongdoing at work, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these.

PROCEDURE

If appropriate, discuss the matter with your manager in the first instance. An informal approach to your manager will be treated as completely confidential and will not result in any report to anyone within the Marston's PLC Group unless you agree.

If the matter requires further investigation, this will be carried out and you will be informed of the outcome and what, if any, action has been taken.

If you remain unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved you should refer the matter to your line manager's manager. When they have investigated your complaint they will tell you the result of the investigation and what, if any, action has been taken.

Marston's PLC undertakes that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47B of the Employment Rights Act 1996. In the event that you believe you are being subjected to a detriment by any person within the Company as a result of your decision to invoke the procedure, you must inform your manager or a member of the Human Resources team immediately. Appropriate action will be taken to protect you from any reprisals.

If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of the Company's disciplinary procedure.

Marston's PLC is keen to hear of any concerns employees have about wrongdoing at work and encourages them to use the procedure described above wherever possible. In extreme cases where it is clear to the employee that making representation to their line manager is inappropriate they should approach a senior member of the Human Resources team or the Company Secretary.

FUTURE AMENDMENTS

Marston's PLC reserves the right to amend this policy when the needs of the business or statutory requirements necessitate such action. Where collective bargaining arrangements exist elected Employee Representatives will be consulted prior to implementing such changes.