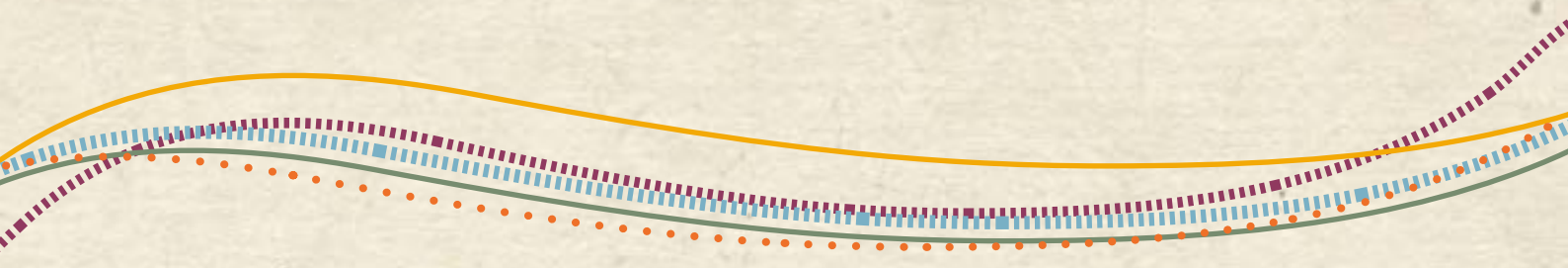


WHISTLEBLOWING POLICY

Date of issue: July 2018



1. About this policy

- I. As part of making Marston's the place to be, we are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible. It is important our people understand how to speak up.
- II. This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers.
- III. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is whistleblowing?

- I. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It also includes concealment of any of the above.

3. How to raise a concern

- I. We hope that in most cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact either a senior member of the HR team or the Group Secretary.
- II. We will arrange a meeting with you as soon as possible to discuss your concern. If further investigation needs to be carried out this will be done and you will be informed of the outcome and what, if any, action has been taken.
- III. Marston's have a confidential reporting line as part of the 'speak up' programme, the telephone number is **0800 007 3111**. The internal email address: **speakup@marstons.co.uk** can also be used.
- IV. Reports made into the speakup programme will be reviewed and actioned by Internal Audit, and will have senior support from the HR function. Anonymised reporting will be provided to the Board at least annually.

4. Confidentiality

- I. We hope that all individuals will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

5. External disclosures

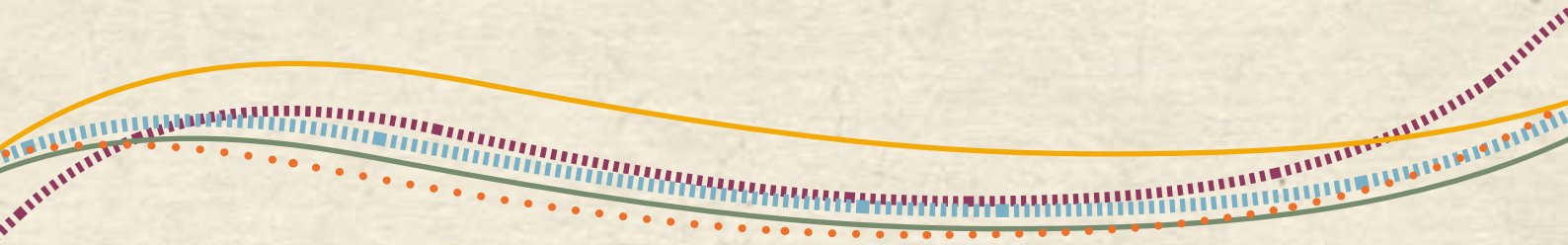
- I. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone outside of Marston's.
- II. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone outside of Marston's. In addition to our own internal reporting lines, Public Concern at Work operates a confidential helpline. Their contact details are on page 4 of this policy.

6. Protection and support for whistleblowers

- I. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- II. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your line manager or senior HR member immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- III. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. [In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.]
- IV. However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.
- V. Public Concern at Work operates a confidential helpline. Their contact details are shown below.

7. Contacts

Speak Up reporting (free and confidential reporting internally)	Helpline: 0800 007 3111 E-mail: speakup@marstons.co.uk
Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk



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