



Whistleblowing Policy

Purpose

My Food Bag Group Limited ("My Food Bag") is fully committed to conducting our business with honesty, fairness and openness and we want to encourage our people to speak out if they see behaviour that does not fit with our values of integrity and honesty.

This policy sets out the processes and principles My Food Bag has in place to encourage you to report suspected wrongdoing. It covers the process for how you should report suspected wrongdoing, how those concerns will be investigated by My Food Bag, and what rights and protections My Food Bag will give you as a whistle blower.

This policy applies to you if you are an employee (past or present), director or officer, secondee, contractor or a volunteer of My Food Bag or its subsidiaries.

What is "wrongdoing" and what should you do about it?

Wrongdoing could include any act or omission by a person which you think is:

- dangerous and could cause a risk to the health or safety of yourself or My Food Bag's customers, colleagues or contractors or to the public;
- likely to cause significant damage to the environment;
- against the law;
- getting in the way of the prevention, investigation or detection of criminal offences by My Food Bag's customers, colleagues, suppliers or competitors;
- sexual harassment, bullying or discriminatory to you, any of your colleagues, or to My Food Bag's customers or members of the public; or
- putting at risk the assets, brand or reputation of My Food Bag.

Wrongdoing includes suspected modern slavery practices. My Food Bag has a zero tolerance for modern slavery practices and expects the highest level of ethical standards to be maintained within My Food Bag and in its supply chain.

If you suspect that wrongdoing is occurring or has occurred, you are encouraged to report it to My Food Bag in accordance with the process set out below. Your rights and protections as a whistle blower are as set out in this policy.

If you volunteer additional information in support of a concern reported by someone else, you will also be entitled to the protections set out in this policy, provided that you volunteer that information to the person who made the initial report, or to the investigator.

Protection and support for whistleblowers

If you raise a genuine concern about a wrongdoing, we are committed to supporting you and ensuring that you do not experience any retaliation from the business.

My Food Bag will:

- offer HR support to any person that makes a report of an actual or suspected wrongdoing;
- strictly prohibit any behaviour that discourages someone from reporting a wrongdoing, or that could amount to retaliation. Any person that engages in such behaviour may face disciplinary, or other, action. In the event that you believe that you have suffered retaliatory action from My Food Bag in response to your disclosure, you may have a personal grievance under the Employment Relations Act 2000; and
- not take any civil, criminal or disciplinary proceedings against you for making the disclosure.

To qualify for these protections the report must be made in accordance with the procedures set out in this policy and in good faith. The protections in this policy will not apply if you make a report of a wrongdoing knowing it to be false or in bad faith.

Protected Disclosures (Protection of Whistle-blowers) Act 2022

You may also have protections available under the Protected Disclosures (Protection of Whistle-blowers) Act 2022 ("Act") if the wrongdoing you are disclosing is serious. If your disclosure is a protected disclosure under the Act, you will have statutory immunity from any civil and criminal proceedings in relation to the disclosure.

Confidentiality

If you report an actual or suspected wrongdoing, My Food Bag will respect your confidentiality as much as we can. My Food Bag will also use its best endeavours not to disclose information that might identify you, unless you have consented to such disclosure.

If you chose to report an actual or suspected wrongdoing externally using one of the options below, then the whistle-blower service will respect your confidentiality as much as they can. They will also use their best endeavours not to disclose information that might identify you, unless you have consented to such disclosure.

However, in limited circumstances this may not be possible, for example where My Food Bag (or the whistle-blower service) is legally required to disclose the information (for example, if required by a court order) or where it is necessary in order to properly and fairly investigate the reported wrongdoing.

Reporting the suspected wrongdoing

My Food Bag's Chief Executive Officer (CEO) is the person who has primary responsibility for this policy. In the first instance, you may wish to consider raising your concerns with the CEO directly.

If you do not feel comfortable making a disclosure to My Food Bag's CEO for any reason, then you can make a report to any of the following persons:

- Head of People and Culture (HR)
- Chief Supply Chain Officer.

If you want to report a suspected wrongdoing externally to My Food Bag's Senior Leadership Team named above, or you wish to request anonymity (depending on the issues at hand) you can report it verbally or in writing to:

Phone: 0800 TIPOFF (0800 847 633)
Email: mfb@whistleblowers.co.nz
Web Form: <https://whistleblowers.co.nz/mfb>
Post: Whistleblowers Service
Incident Response Solutions Limited
PO Box 1946, Shortland St
Auckland, 1140

Investigating the suspected wrongdoing

All investigations will be conducted in a manner that is fair, objective and reasonable. The process for investigating your concern may vary depending on the nature of the conduct reported.

Where a complainant wishes to be remained anonymous and/or an external investigation is required, we have engaged with Incident Response Solutions Limited to conduct investigations on our behalf and to assure impartiality. This is particularly important if the suspected wrongdoing involves a member of the Senior Leadership Team within My Food Bag.

Full Investigation

Where a full investigation is warranted, the investigator shall establish a process for the investigation, to be carried out as quickly as reasonably possible.

You as the reporter of the alleged misconduct will be interviewed as part of the full investigation. The person(s) involved in the wrongdoing will also be interviewed and will be given the opportunity to respond to the allegation. As set out above, we will respect your confidentiality as much as we can. During the investigation we will require you to keep everything about the investigation, including the contents of your disclosure, confidential too.

If the outcome of the investigation shows that wrongdoing has occurred, then My Food Bag will take all reasonable and practicable steps to make sure it doesn't happen again. Outside authorities may be involved if we think it is necessary.

You will be kept informed of the progress of the investigation throughout, and at the conclusion of the investigation you will be told whether the wrongdoing was upheld or not. The investigator may also disclose details of the investigation to the Board.

Policy Review

The Board will review this policy as required and at least every two years.

Last reviewed: 16 March 2023

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