



## **LeanPie Ltd and LeanPie USA Inc. – Whistle Blowing Policy**

### Purpose and scope

We are committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage. We also recognise the negative effect which malpractice can have on the organisation, and therefore encourage you to raise genuine concerns, or any suspicions you may have concerning misconduct.

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through the Grievance Procedure. Complaints relating to discrimination, victimisation or harassment should be dealt with through the Grievance Procedure Harassment Policy.

This Policy applies to full and part-time workers, and contractors, home workers and agency workers, except if they are genuinely self-employed.

This Policy is non-contractual and may be amended by us at any time.

### Protection

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

Should you feel you have been subjected to any detriment as a result of raising a concern under this Policy you should notify [HR Manager/Your immediate Line Manager].

### Disclosures under this Policy

You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity;
- Miscarriages of justice;
- Practices endangering health and safety;

- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Bribery;
- Financial malpractice, impropriety or fraud;
- Serious failure to comply with any codes of practice or ethical rules covering the business;
- Any suspicion of slavery or human trafficking
- Attempts to conceal any of the above.

The malpractice can be past, present or prospective. It may have occurred inside or outside the United Kingdom.

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

### Confidentiality and anonymity

Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

### How to make a disclosure

In the first instance you should bring the matter to the attention of [your immediate manager], who will inform [HR Manager]. If the disclosure contains allegations about [your immediate manager] or the malpractice occurs at this level, you may make the disclosure directly to [HR Manager].

If your disclosure contains allegations which you do not wish to make to your line Manager, you can make the disclosure to our CEO, Mr Carlos Kassner.

If your disclosure concerns a very serious allegation the Board will be notified.

Carlos Kassner (CEO) can be contacted at [carlos.kassner@leanpie.com](mailto:carlos.kassner@leanpie.com) or directly on +44 7838 863366.

### Investigation

Once a concern has been raised, we will initiate an investigation. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

### Dissatisfaction with the outcome of the process

If you are dissatisfied with the outcome of the investigation, you should raise this with the [Director/directly to the Chairman of the Board], giving the reasons for your dissatisfaction. He/she will respond in writing notifying you of his/her acceptance or rejection of the need for further investigation and the reasons for this.

### Training

This Policy will be made available to all employees via the company one drive. All managers will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any disclosure being made to them.

### Breach of this Policy

We may invoke the Disciplinary Procedure if you are found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled us in respect of any matter, breached this Policy in any other way and/or if we believe that you have made a false allegation maliciously.