

All Group Policies are intended to set out the minimum principles to which the Group subscribes – where necessary, local companies should adjust policies to take into account local requirements, specifically local currencies where amounts are stipulated.

*Please apply a local relevant value if outside the UK.

Whistleblowing Policy

Owner: Group Company Secretarial

- Updated: October 2016
- Reviewed: October 2017
- Reviewed: December 2018
- Reviewed: December 2022

About the policy

We want to do the right thing. We want this to be an inspiring place to work where people can confidently highlight behaviour that goes against our Code of Conduct or relates to inappropriate or unethical behaviour.

Naked Wines has a duty to identify inappropriate or unethical behaviour and take the appropriate measures to remedy the situation. By encouraging a culture of openness we aim to prevent such behaviour and enable employees to highlight issues which may concern them at work. We have a legal obligation to protect all employees from any form of retribution, victimisation or detriment as a result of making a whistle blowing report.

Who does the policy apply to?

The policy applies to all employees, including any temporary members of staff. It also covers suppliers and those contracted to provide a service to the Company. The hotline may also be used by external people / members of the public to report a concern with Naked Wines or its employees.

When to speak up

The policy applies where an employee genuinely believes that a situation of inappropriate or unethical behaviour has occurred or could occur within the Company or its supply chain. Some examples of these situations are:

- A criminal offence being committed
- Someone (employee / supplier) is breaking the law
- Someone's health and safety is in danger



- Risk or actual damage to the environment has happened or is likely to happen
- There has been a miscarriage of justice
- You believe someone is covering something up in relation to any of the above

You do not need to prove the whistleblowing allegation BUT you should reasonably believe it to be true and it must be made in good faith. If you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action against you, may be taken. The Company is unable to protect you from prosecution if the disclosure relates to you committing a criminal offence.

Issues of a personal nature, or relating to your employment conditions, are generally not matters suitable for reporting through this policy and should be addressed through the internal grievance process or with the people team. Some cases of discrimination and / or bullying may be addressed through this process, but should ideally be dealt with through the engagement of the people team.

Confidentiality and Protection

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

We encourage you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. Concerns expressed anonymously are much less powerful but they will still be considered.

We will ensure that any member of staff who makes a disclosure will not be penalised or suffer negative consequences in relation to their employment as a result thereof and we will not tolerate the harassment or victimisation of anyone raising a genuine concern.

Who should you notify?

Employees with concerns about Naked Wines

In the first instance you should inform your Line Manager who will treat the matter in confidence. Should the disclosure involve your Manager you should inform your Regional/Department Manager or a member of the people team. You can always raise concerns by emailing speakup@nakedwines.com and this can also be done anonymously if you wish to do so.

Employees with concerns in relation to other companies Naked Wines work with

In almost all cases raising concerns internally is the most appropriate course of action; however, there may be occasions when you feel you cannot raise your concerns within the Company. In these circumstances, you should raise the issues with a prescribed regulatory or independent organisation such as the Health & Safety Executive, the Financial Services Authority or the Inland Revenue.

3rd parties raising concerns about Naked Wines

To raise your concerns with the Company please write to the Group Company Secretary, or email speakup@nakedwines.com.

What we will do

- We will receive the report and, if not made anonymously, acknowledge receiving it.
- You will be given full support from senior management and your concerns will be taken seriously.
- We will investigate your allegation, taking into account the seriousness of the issue raised, the credibility of the concern and any corroborating information.
- You will receive a report on the outcome of the investigation, provided you have not made the disclosure anonymously.
- You will be protected against any adverse consequences and, if you feel that you have suffered in this manner, you should immediately bring it to management's attention (your immediate manager, with ongoing escalation in the event that you feel your concern has not been addressed).

This policy is not contractual and may be amended at any time.