

# SPEAK-UP POLICY



## Overview

Ensuring food safety is a continuous and proactive effort that demands vigilance against both emerging risks and persistent threats to safe and high-quality food production. Challenges such as food fraud, negligence, and mismanagement can often be obscured, particularly when deliberate deception is involved. While food safety management systems provide critical safeguards, they may not catch every threat, even with robust regulatory and internal oversight.

Unethical or illegal practices by individuals or groups within the Company can evade detection by regulatory authorities and senior management. However, fostering a culture of ethical behaviour among all personnel—from team members to managers—is essential. Empowering individuals to recognize and report misconduct is a vital step toward preserving the integrity of food safety standards and protecting public health.

Salada's *Speak Up Policy* is designed to encourage disclosure and protect courageous team members to report and disclose any wrongdoing in the food manufacturing process with confidence.

## Responsibility and Oversight

The **Corporate Governance Board Committee** holds ultimate responsibility for the oversight and governance of the *Speak Up Policy* at Salada Foods. This Committee ensures the policy's effectiveness, alignment with Salada's corporate values, and compliance with legal and ethical standards. It also oversees the implementation and monitoring of the policy, providing strategic direction to foster a culture of accountability and integrity throughout the Company.

The **General Manager**, reporting to the Corporate Governance Board Committee, is tasked with the day-to-day management and enforcement of the *Speak Up Policy*. Specific responsibilities of the General Manager include:

- **Investigating Reports:** Promptly and thoroughly investigating all internal reports or disclosures from team members, ensuring fair and impartial handling.
- **Addressing Retaliation:** Taking decisive action to sanction managers or team members who attempt to block internal reports, interfere with investigations, or retaliate against whistleblowers.
- **Protecting Whistleblowers:** Safeguarding whistleblowers who disclose information in the public interest, ensuring they are free from discrimination, harassment, or retaliation.

PW

## Definitions

### *Who is a Whistle Blower?*

Whistle blowing is defined as the reporting by team members or former team members of illegal, irregular, dangerous or unethical practices by employers or fellow colleagues. A whistle blower may have observed wrongdoing or even participated in the wrongdoing itself, but because of personal and professional ethics, the whistle blower feels a duty to report the wrongdoing to a higher authority.

### *What qualifies as a disclosure?*

A disclosure is made if a failure to do so may affect the health of any member of the public if they consume food that is affected - or if it concerns the protection of consumers' interests in relation to food.

A qualifying disclosure for whistleblowing occurs if the worker reasonably believes that one or more of the following is happening now, took place in the past, or is likely to happen in the future:

- a food violation
- a criminal offence
- the breach of a legal obligation
- a miscarriage of justice
- a danger to the health and safety of any individual
- damage to the environment
- a deliberate attempt to cover up any one of the above

## Violations

The main types of food violations are:

- **Theft** - dishonestly obtaining food, drink or other materials to profit from their use or sale
- Illegal processing – preparing or packaging food, drink and related products in unapproved premises or using unauthorised techniques
- **Waste diversion** - illegally diverting food, raw or packaging materials meant for disposal, back into the supply chain
- **Adulteration** - including a foreign substance which is not on the product's label to lower costs or fake a higher quality
- **Substitution** - replacing a food or ingredient with another substance that is similar but inferior
- **Misrepresentation** - marketing or labelling a product to wrongly portray its quality, safety, origin or freshness

# SPEAK-UP POLICY



- **Document fraud** - making, using or possessing false documents with the intent to sell or market a fraudulent or substandard product

## Making a Disclosure

A report may be made to the General Manager if there is reasonable belief that improper conduct has occurred, is occurring or is likely to occur, by completing the attached disclosure form. Reports may be made anonymously; however, they are typically less credible but may be considered at the discretion of the General Manager.

Furthermore, team members who suspect a wrongdoing but cannot provide direct evidence for their concern, or whose information cannot be validated, will not be penalized in any way for raising the issue, particularly if this takes place in the Company.

Reports are to be treated with the strictest confidence by the General Manager. The identity of the whistle blower is not to be disclosed unless it is necessary for the completion of any internal investigation to be conducted or otherwise agreed by the team member. All reports must be made in good faith that is, without malice or consideration of personal benefit and the whistle blower reasonably believes that the reports are true. Malicious and unfounded reports may give rise to disciplinary action.

This policy does not change the Company's policies in relation to individual team member grievances.

Disclosures should ideally detail the following:

- product or process impacted
- timeline of the incident
- nature of the food violation

Disclosure forms may be used to aid submission, and these can be downloaded from the Company's website at [www.saladafoodsja.com](http://www.saladafoodsja.com) under the tab 'Corporate Governance'

Disclosures may be made through the following channels:

- Insert the completed disclosure form in the secured Suggestion Box posted by the Canteen area
- Email to [governance@saladafoodsja.com](mailto:governance@saladafoodsja.com)

PW

# SPEAK-UP POLICY



## Investigations

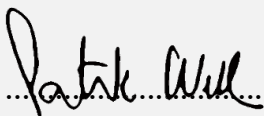
When a disclosure is made, the General Manager should receive and record the matter being disclosed and determine whether an investigation should proceed. If an investigation is considered necessary, the General Manager must:

- i. Provide periodic updates to the team member at thirty-day intervals;
- ii. Ensure that the investigation takes into account the rules of Natural Justice and the need to safeguard individual reputations;
- iii. Report the findings of the investigations to the whistleblower, the Corporate Governance Committee of the Board of Directors of Salada Foods and to any appropriate law enforcement or oversight body .
- iv. Make recommendations and take steps to remedy the improper conduct.
- v. Complete investigations within sixty (60) days from receiving a report.
- vi. Following an investigation, other relevant internal procedures may be invoked including the Company’s disciplinary policy.
- vii. The General Manager may in good faith refuse to deal with a report or investigate same or cease an investigation where the disclosure made in the report:
  - o Has been adequately dealt with or could more appropriately be dealt with by another person; or entity
  - o The subject matter is frivolous and does not warrant an investigation;
  - o The circumstances surrounding the report have changed such that it renders the investigation unnecessary.

The team member must be notified within fifteen (15) days of this decision.

If no steps are taken by the General Manager within thirty (30) days of a report being made then a report may also be escalated directly as appropriate to the Chairman the Corporate Governance Committee of the Board of Directors of Salada Foods via email to [governance@saladafoodsja.com](mailto:governance@saladafoodsja.com)

**Document:** *Speak Up Policy, Salada Foods Jamaica Limited, version 1.0*

**Approved by:** .....

Patrick Williams, Chairman, Salada Foods Jamaica Limited

**Date:** November 14, 2024  
.....