

## Whistleblowing Policy

### 1. When should this be used?

- 1.1 Just Eat is committed to conducting its business honestly and with integrity at all times. However, all organisations face the risk of their activities going wrong from time to time, or of unknowingly and unintentionally harbouring illegal or unethical conduct.
- 1.2 The aim of this Policy is to ensure that employees are confident they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.
- 1.3 The Policy should be used:
- to encourage reporting of suspected wrongdoing as soon as possible, in the knowledge that concerns will be taken seriously and investigated as appropriate;
  - to provide guidance as to how to raise concerns; and
  - to reassure employee that they can raise genuine concerns without fear of reprisal.
- 1.4 This Policy is not contractual. Just Eat may vary or amend this Policy at its discretion and may apply it as far as practicable in the circumstances.

### 2. Who does this apply to?

This Policy applies to all individuals working for Just Eat, whether permanent, temporary, casual, part-time or on fixed term contracts, employees, ex-employees, job applicants, agency workers, contractors, consultants and volunteers who are not our employees but who work for Just Eat (known collaboratively as “employee” for the purposes of this Policy).

### 3. What does this cover?

“Whistleblowing” is the disclosure of information which relates to suspected wrongdoing or dangers connected to work or the business of Just Eat. These may include:

- criminal activity or bribery;
- danger to health and safety;
- damage to the environment;

- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement;
- modern slavery and related offences;
- unethical or dishonest conduct;
- unauthorised disclosure of confidential information; and
- the deliberate concealment of any of the above matters.

This Policy should not be used for complaints relating to an employee's employment rights, such as the way an employee has been treated at work. In those cases Just Eat's Grievance Policy should be used.

If you are unsure whether a concern is a matter relating to your own personal circumstances or a whistleblowing matter, you are still encouraged to raise it and then you will be advised as to which route to take.

If employees feel comfortable doing so, they can report their concerns to their Line Manager or HR contact. However, if employees consider this inappropriate, then they may instead raise the concern with the Human Resources department.

#### **4. How to raise a Whistleblowing concern?**

It would be Just Eat's preferred approach for concerns to be raised internally so that matters can be dealt with as swiftly as possible, however there is also the option to raise a concern via an external body.

Just Eat recognises that there may be circumstances in which employees might feel unable or extremely uncomfortable reporting a concern internally so there is an option to raise a concern using the Whistle Blowing telephone service operated by Expolink, an external and independent organisation. This service operates on a 24/7 basis, 365 days a year. Contact with Expolink is made by telephoning one of the Freephone numbers listed below, where a trained operator will take details of the issue and provide a report in strict confidence to the General Counsel and the Chief People Officer except:

- where the concern relates to any member of the Executive Team (including the General Counsel and/or the Chief People Officer) and/or any member of the Board of Directors it will be forwarded to the Chairman and the Company Secretary;
- where the concern relates to the Company Secretary and/or any member of the Board of Directors it will be forwarded to the Chairman; and/or
- where the concern relates to the Chairman it will be forwarded to the Senior Independent Non-Executive Director.

Location of employee	Number
UK	0800 374199
Denmark	8088 4368
Canada	1888 268 5816
Ireland	1 800 567 014
Switzerland	0800 563823
Mexico	01800 123 0193
Brazil	0800 891 8807
France	0800 900240
Italy	800 783776
Australia	1800 121 889
New Zealand	0800 443 816
Norway	800 14870
Spain	900 944401

Concerns can also be made by email to [justeat@expolink.co.uk](mailto:justeat@expolink.co.uk). Please note that our organisation's access code, if required, is "Justeat". There are additional channels, including a downloadable mobile App, available here:

<https://www.expolink.co.uk/whistleblowing-hotline/reporting-options/>

## 5. Investigation & Outcome

Just Eat is committed to investigating disclosures fully, fairly, promptly and confidentially where circumstances permit. An employee may be invited to attend an initial meeting in order to give them further information.

Just Eat will aim to keep the whistleblower informed of progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent Just Eat from giving specific details of the investigation or any disciplinary action taken as a result.

As soon as practicable after any investigation, recommendations as to what further steps are to be taken will be made.

Further action will not normally be taken where Just Eat is:

- satisfied that the malpractice has not occurred or is not likely to occur;
- aware that the matter is already subject to legal proceedings, or has already been referred to the police or other public authority;
- aware that the matter is already (or has already been) the subject of proceedings under one of Just Eat's other appropriate procedures or policies.

If Just Eat concludes that the false allegations have been made intentionally, disciplinary action may be taken against the whistleblower.

## **6. Support**

Just Eat will support anyone raising a genuine concern and even if it turns out to be mistaken the whistleblower will not suffer any detrimental treatment as a result of raising a concern in good faith. If employees believe that they have been subjected to a detriment within the workplace as a result of raising concerns under this procedure, they should inform their Line Manager or the Chief People Officer immediately.

## **7. Confidentiality**

Just Eat hopes that all employees will feel able to voice whistleblowing concerns openly using this Policy. Just Eat does not encourage anonymous disclosures as it is more difficult to conduct proper investigations if further information cannot be obtained from the whistleblower as necessary.

Every effort will be made to keep the identity of an individual who makes a disclosure under this Policy confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, employees will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential.

## **8. Monitoring and revision of this Policy**

Just Eat will monitor this Policy and review it from time to time.