

Whistleblowing Policy

Domino encourages an open culture for the reporting of concerns, and fosters a safe environment in which to make whistleblowing reports

What does this policy cover?

Domino encourages an open culture within its staff, and all of those who it engages with in business and legal relations. It recognises that effective and honest communication, and a culture of openness and accountability is essential in order to prevent unethical or illegal conduct, and to effectively deal with such conduct should it occur.

The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any violations of any business policy, local laws or regulations; allowing all staff to express, in good faith, any genuine concerns, issues or complaints that amount to whistleblowing, in a safe environment without fear of reprisal.

Who does this policy apply to?

This Policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (collectively referred to as “staff” in this policy). It also covers all Domino Group Companies throughout the world. This Policy does not form part of an employee’s contract of employment and may be amended at any time.

What are your obligations?

All staff are responsible for the success of this Policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

If any staff have any genuine concerns related to suspected wrongdoing or danger affecting any of Domino’s activities, they should report it under this Policy.

What is whistleblowing?

“Whistleblowing” is the disclosure of information which relates to suspected wrongdoing or dangers at work. It includes, but is not limited to, situations where:

- a criminal offence has been committed, is being committed, or is likely to be committed;
- a person has failed, is failing, or is likely to fail to comply with any legal obligation to which he or she is subject;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- the health and safety of any individual has been, is being, or is likely to be endangered;
- there has been, or it is suspected that there will be, damage to the environment;
- there has been, or will likely be, a breach of Domino’s Ethical Business and Anti-Bribery and Corruption Policy; and/or
- there is deliberate concealment of any of the above matters.

Raising Concerns

Internal disclosures

In many cases you may be able to raise any issues or concerns with your line manager first. They may then be able to agree a way of resolving your concern quickly, or they may refer the matter to the Whistleblowing Officers (named below).

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, Domino has established a secure email address which allows all staff to express any concerns, issues or complaints relating to any violations of any business policy, local laws or regulations in a safe environment. All emails received, will be reviewed and fully investigated by one or both of the Whistleblowing Officers; the Group Human Resources Director (Chris Webb) and General Counsel (John-Paul Martin).

The email address to send your concerns to is: raiseconcerns@domino-printing.com.

Alternatively, you can speak to either of the Whistleblowing Officers in person or over the phone.

Investigation and outcome

If a case arises where further investigation will be necessary, you may be required to attend an investigative hearing as a witness. In this instance appropriate steps would be taken to ensure that your working environment and/or working relationships is/are not prejudiced by the fact of your disclosure.

We will aim to keep you informed of the progress of any investigation that takes place after you have raised a concern. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Confidentiality

If you raise a concern through the whistleblowing email address, the Whistleblowing Officers will treat the information they receive as confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously as it can make proper investigation more difficult or impossible if we cannot obtain further information from you. Anyone concerned about possible reprisals if their identity is revealed should come forward to either of the Whistleblowing Officers, and appropriate measures will be taken wherever possible to preserve your confidentiality.

External disclosures

Whistleblowing concerns could relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier, distributor or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly.

However, we encourage you to report such concerns internally first. You should contact your line manager or either of the Whistleblowing Officers.

“Bad faith” disclosures

This policy applies where a disclosure is made in good faith and where you reasonably believe that the information disclosed, and any allegation contained in it, are substantially true. Disclosures must not be made in bad faith (i.e. maliciously, to cause disruption, or for personal gain). If we conclude that a whistleblower has made false allegations maliciously, or in bad faith, or with a view to personal gain, the whistleblower may be subject to disciplinary action.

Support for whistleblowers

Whistleblowers should not suffer any detrimental treatment as a result of raising a genuine concern, even where that concern turns out to be unfounded. Domino’s policy does not allow any staff to retaliate against anyone for making a good faith report of a violation. If you believe that you have suffered such treatment you should inform either of the Whistleblowing Officers immediately. Subjecting a whistleblower to any detrimental treatment may lead to disciplinary action being taken.



Chris Webb

Group Human Resources Director



John-Paul Martin

General Counsel