

WHISTLEBLOWING POLICY STATEMENT

The Board of McBride plc is committed to maintaining the highest standards of honesty, openness and accountability .

Employees will usually be the first to know when someone inside or connected with an organisation is doing something illegal, dishonest or improper, but may feel apprehensive about voicing their concerns. The Board does not believe that it is in anyone's interests for employees with knowledge of wrongdoing to remain silent.

This document sets out the Group's policy and a procedure by which you can report your concerns and be sure they are acted upon. The whistleblowing policy statement is intended to act as a deterrent to fraud or other corruption or serious malpractice; it is also intended to protect the Goup's business and reputation.

POLICY STATEMENT

McBride plc takes all malpractice very seriously, whether it is committed by an employee, supplier customer, competitor or contractor.

This policy statement applies to all permanent and temporary employees, agents and contractors. It is intended to complement statutory protection and, for the avoidance of doubt, statutory rights will not be affected in any way by this policy.

The following examples demonstrate what we mean by serious malpractice :

- Fraud, corruption, bribery or other malpractice which could lead to a financial loss to the Group
- Criminal offences, eg. Theft, Drug taking,
- Breaches relating to the accuracy or integrity of the Group's financial statements;
- Failure to comply with legal obligations
- Actions which are intended to conceal any of the above

If you become aware of any such activities or other possible malpractices you are encouraged to follow the procedures set out below. It will not always be clear that a particular action falls within one of these categories and you will need to use your own judgement. However, if you believe the matter to be serious, McBride plc would prefer you to report your concerns rather than keep them to yourself.

PROCEDURE

How do I make a report?

You can make a report orally or in writing. Normally, you should inform your immediate manager, or their line manager. Alternatively, you may contact the Company Secretary, who will act as an independent source of advice and assistance within the company.

The contact details for the Company Secretary and his deputy are as follows :

Robert Beveridge Email : b.beveridge@mcbride.co.uk
Phone : +44 20 75 39 78 63

Carole Barnet Email : c.barnet@mcbride.co.uk
Phone : +44 0161 655 2318

Alternatively you can contact The Company Secretary by following a link on the McBride PLC website :

http://www.mcbride.co.uk/about/contact_form.html

Is there a place where I can go for independent advice?

If you do not know what to do and wish to discuss your alternatives you may contact the Company Secretary for a confidential discussion. Alternatively follow this link to the Public Concern at Work web site. <http://www.pcaw.co.uk/index.htm>

Or ask your Personnel manager for advice.

Do I need proof of wrongdoing to make my report?

McBride plc does not expect you to have absolute proof of any malpractice that you report. However, you will need to be able to explain the reasons for your concern and McBride will not tolerate spurious or inconsequential allegations.

How will my report be investigated?

Once you have made a report, McBride plc will acknowledge receipt of it within 5 working days.

Preliminary enquiries will then be made by an independent senior manager as confidentially as possible. If the person raising the concern is required to attend he or she may be accompanied by a fellow employee of their choice or a Union Representative where appropriate.

If it is determined that a fuller investigation is necessary, this will proceed either with further internal investigations or by referral to the appropriate external body dependent upon the nature and the seriousness of the report.

Will McBride plc protect my identity if I make a report?

If you make a report, McBride plc will do everything possible to keep your identity as confidential as possible during the investigation and you may assume that only McBride plc staff investigating the malpractice concern will know your identity. However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) where you may be needed as a witness and, once the investigation is complete, the findings may need to be communicated to the individual(s) concerned (see below). Should this be the case we will discuss the matter with you at the earliest opportunity.

If the report is made to your line manager (or his/her manager) he will provide summary data to the Company Secretary so that we can monitor the usage and effectiveness of this policy. The summary data consolidated will not include the name and contact details of the whistleblower.

Can I protect my identity by reporting on a confidential basis?

McBride would prefer you to give your name and contact details when you make a report. However, subject to any legal constraints, and after listening to your initial explanation you may be allowed to communicate your concern on a confidential basis.

What will happen on completion of the investigations?

Subject to any legal constraints, McBride plc will communicate the findings of the investigation to:-

- a) you as the person raising the report;
- b) the individual(s) under investigation; and
- c) if appropriate, those members of McBride plc management or external authorities who need to consider whether action should be taken on the basis of the findings.

As with any case where an employee is found to be involved in wrongdoing, they will be dealt with effectively in accordance with employment law and contracts of employment.

A high level summary record of the incident will be held in the Company Secretary's office.

Am I at risk of suffering victimisation if I raise a report?

You can be assured that, if you raise a malpractice concern, this will be taken seriously and you will be treated fairly and with discretion. We will take all reasonable steps to ensure that no person under our control engages in victimisation of any form. If you make a report in good faith then, even if it is not confirmed by an investigation, your concern will be valued and appreciated and you will not be liable to disciplinary action. However, if you make a false report, maliciously or for personal gain, then you may face disciplinary action.

What can I do if I am unhappy with the way McBride plc has dealt with my report?

If you are unhappy with the outcome of an investigation, you should submit another report explaining why this is the case to the Company Secretary or your Personnel manager. Your concern will be investigated again if there is a good reason to do so.

Whistleblowing Reporting of Possible Serious Malpractice

Name of person submitting Report :

Date of Report :

Work Location :

Line Manager :

Suspected Malpractice :

Response of Alleged Wrongdoer:

Follow up Investigation:

Initial Response (within 5 days):

Actions Taken

Final Reponse :

Date Resolved :

Date Reported to Company Secretary office :