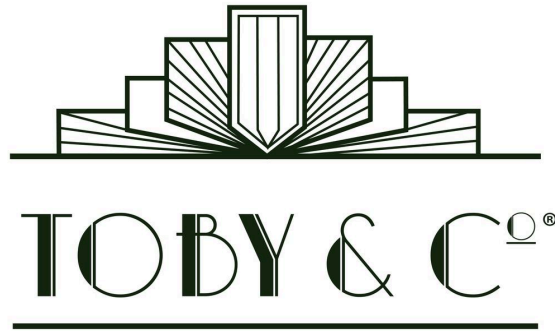




Whistleblowing, Data Protection Compliance, and Anti-Bribery Policy

Effective Date: 1st of January 2026

Version: 1.0

1. Purpose

Toby&Co Beverages Ltd ("the Company") is committed to conducting its business ethically, lawfully, and responsibly. This policy provides guidance on:

- Reporting wrongdoing or unethical behavior (Whistleblowing)
- Handling and protecting personal and sensitive data (Data Protection Compliance)
- Preventing bribery and corruption (Anti-Bribery Compliance)

All personnel are expected to adhere to these standards to protect the Company's integrity, reputation, and stakeholders.

2. Scope

This policy applies to:

- All employees, contractors, consultants, and temporary workers
 - Third parties acting on behalf of the Company
 - All operations and business activities, including international dealings
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3. Whistleblowing

3.1 Reporting

Employees and stakeholders are encouraged to report:

- Illegal activities or violations of law
- Breaches of Company policies
- Health and safety concerns
- Fraud, financial misconduct, or unethical practices

Reports can be made confidentially to:

- HR Contact
- Email: **toby@tobyandco.uk**

3.2 Protection from Retaliation

Retaliation against anyone reporting concerns in good faith is strictly prohibited. Violators face disciplinary action, up to and including termination.

3.3 Investigation

All reports will be investigated promptly, fairly, and confidentially. Feedback will be provided to the whistleblower where appropriate.

4. Data Protection Compliance

4.1 Principles

The Company complies with UK GDPR and Data Protection Act 2018. Personal data must be:

- Processed lawfully, fairly, and transparently
- Collected for specific and legitimate purposes
- Accurate and up-to-date

- Kept secure and retained only as necessary

4.2 Employee Responsibilities

Employees must:

- Handle data responsibly and confidentially
- Avoid disclosing personal data to unauthorized persons
- Report breaches immediately to the **Data Protection Officer (DPO): toby@tobyandco.uk**

4.3 Rights of Data Subjects

The Company respects data subject rights, including access, correction, deletion, and objection to processing.

5. Anti-Bribery Compliance

5.1 Policy Statement

Bribery and corruption are strictly prohibited. Employees must not:

- Offer, promise, give, or accept bribes
- Engage in corrupt practices for personal or business gain

5.2 Gifts and Hospitality

Modest, reasonable, and lawful gifts or hospitality are allowed if:

- Proportionate and transparent
- Do not create improper influence

5.3 Reporting

Suspected bribery or corruption must be reported to the **CEO or Compliance Officer**.

5.4 Consequences

Violations may result in disciplinary action, legal liability, or termination.

6. Responsibilities

- **All employees:** Comply with this policy and report concerns

- **Management:** Promote a culture of ethics, compliance, and transparency
 - **Compliance Officer / DPO:** Monitor, train, and enforce the policy
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7. Monitoring and Review

This policy will be reviewed annually or as needed due to legal or regulatory changes. Updates will be communicated to all employees.

Approved by:

Management – Toby&Co Beverages Ltd - Signed by Tobias Gorn Founder and CEO -

A handwritten signature in black ink, appearing to be 'TG', enclosed within a circular scribble.

Policy Review Cycle: Annually