

External Stakeholder Grievance Mechanism

Purpose

Wicklow Wolf believes that being a responsible, accountable business means giving people a genuine way to speak up. This mechanism exists so anyone connected to our work - whether they're part of our team, our supply chain or our wider community - has a safe, straightforward path to flag a concern about our social, environmental or ethical conduct and can trust it will be looked at and acted on.

Scope

This mechanism has been developed to support anyone affected by how Wicklow Wolf operates - not just within our own walls but also across the people and businesses we work with. That means concerns connected to our brewery, our suppliers, our contractors and the partners we collaborate with. It is designed to support wherever our decisions or activities might have a real bearing on people, communities or the environment.

Out of Scope

It is important to note that this isn't the route for everyday matters such as product queries or a general customer service questions. This mechanism exists specifically for concerns about how we or the businesses we work with treat people, communities or the environment. If something you raise turns out to sit outside that, we'll point you to alternative channels for resolution.

Who Can Raise a Concern

This mechanism has been designed to support all of our stakeholders who are connected to our business, including:

- Anyone working for us or for the suppliers we rely on
- Our customers
- Communities near our brewery, hop farm or supplier sites
- Investors, partners and others who we do business with

Types of Concerns

This mechanism is designed to support our stakeholders to raise concerns that include but are not limited to:

- How people are treated at work, whether in our own operations or further up our supply chain
- Our impact on the environment
- How we communicate and market our products
- The conduct of the businesses we source from
- Broader questions about how we govern ourselves and our commitments

How to Raise a Concern



Website form: <https://wicklowwolf.com/grievances/>
Email: info@wicklowwolf.com

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Where possible we encourage you to provide us with as much context as possible to support your concern, including but not limited to: what happened, when and any evidence you have. These routes are always open and we do not enforce a time-bound window for you to submit concerns by.



Confidentiality & Protection from Retaliation

At Wicklow Wolf, we're committed to supporting all our stakeholders to voice any concerns openly and safely. Any concern raised in good faith will be treated with respect and you won't face any negative consequences for coming forward. If you'd rather stay anonymous or keep your identity confidential, we'll do what we reasonably can to protect that - your details go only to the people directly handling your case, not beyond.

We at Wicklow Wolf are a small team, so we are honest about the limits and protect people as far as we can:

- Anyone named in a grievance, including the owner, has no access to the file and plays no part in deciding it.
- Before speaking to the respondent or witnesses, the Grievance Lead tells the complainant what will be shared and with whom and discusses any concerns about being identified.
- Staff are told not to discuss the case with colleagues and that gossip or speculation about who complained is itself a breach.
- A simple access record (date, who, why) is kept inside the case file.
- Anonymous concerns can be raised through our anonymous online form. We will act on them as far as we can, and never try to find out who sent them.

When a grievance comes in, the Grievance Leads must consider, before telling anyone else: is this person at risk, or in a position that makes it hard to speak up? If yes, they agree a short written protection plan with the person before the case moves forward.

Someone may be more at risk if, for example:

- They are complaining about the owner, their direct supervisor, or a family member of the owner.
- They are new, casual, on probation, young (under 18), or their visa depends on the job.
- They have a disability or health condition, are pregnant, or have difficulty with English or reading.
- The complaint is about harassment, sexual misconduct, discrimination, violence or threats.
- The team is so small that everyone will guess who complained.

Risk Assessment: A short conversation, recorded on one page in the case file: what could go wrong, how likely, what the person is worried about, and what would help. It is looked at again at each step and if anything changes.



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How the Process Works

1. You'll hear from us

If we have details to contact you, we will confirm we've received your concern in 72 hours of submission. Following this we will also contact you within the following 5 working days to confirm if your concern is in scope and what the anticipated next steps are.

2. We work out who should handle it

We look at what the issue actually involves and who internally is best placed to take it forward. Again, ensuring only the people who are explicitly required to handle the case is involved.

3. We assess & investigate

If there's more to understand, we'll gather further information or speak to people involved.

4. We provide a response and potential outcomes

Where appropriate, we'll let you know what we found and what happens next, ensuring all stakeholders involved are provided with an update. We aim to resolve raise concerns within 30 day, however depending on severity it can take longer.

5. Continuous Improvement

Whatever we learn from grievances raised can be used to improve how we operate - through our commitments, our policies and processes

We aim to resolve most concerns within 30 days. Where a concern is more complex and needs longer, we'll let you know and keep you updated on progress.

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Governance

Responsibility for this mechanism sits with our Board of Directors, as it is designed to form one part of how we hold ourselves accountable more broadly. What we learn from concerns raised doesn't stay static - it feeds directly back into how we shape our policies and practices going forward. Operational accountability sits with our Senior Leadership team.



Ownership & effectiveness

Responsibility for monitoring sits with the two named internal monitors, as part of their wider roles – shared and well-defined, not one dedicated position.

Grievance records are kept apart from everyday staff files, in one place only the Grievance Leads can open.

- Grievance emails go only to the named people involved, with "Confidential" in the subject line.
- Meetings happen somewhere private: a closed office, off-site, or by phone or video call outside shared spaces.
- Health or other sensitive personal details are only recorded if needed for the case.
- Personal data is handled in line with GDPR data protection law.

Resolution authority: the SLT resolves standard concerns. The Board holds overall accountability for this mechanism and handles escalation for anything serious, systemic, or reputationally significant.

Effectiveness is shown either by a real closed case, or – with zero cases – by proving the mechanism, including tracking, is genuinely used.



Grievance Register

Every case logged: reference, date, status, who raised it (or confidential), who it concerns, location, and nature. An Annual Summary is compiled from this each year.

Approved By & Effective Date: Board of Directors, July 2026
Updated: September 2026
Next Review Date: July 2027