



Speak Up Policy

**Associated
British Foods**
plc

To read the Speak Up Privacy Notice in Appendix 2 to this document, please click [here](#).

Associated British Foods plc commitment

At Associated British Foods plc (ABF) we do business the right way. Good governance and ethical behaviour are at the heart of our agenda. We are committed to always acting with integrity. We proudly promote and protect a culture of trust, fairness and accountability that puts ethics first.

We promote a culture of openness. We know that we are a stronger company when our people feel empowered to Speak Up. We encourage effective and honest communication at all levels of the organisation.

If any individual working at any level of the organisation becomes aware of anything they believe to be inappropriate, improper, dishonest, illegal or dangerous, we want them to come forward and express their concerns.

We understand that individuals may feel nervous about Speaking Up, so we will ensure they are protected from negative consequences as a result of Speaking Up. We hope that individuals feel able to Speak Up internally; we advise our managers on how to deal with these issues discreetly and appropriately; but failing that we have a confidential and anonymous (where allowed) mechanism for Speaking Up.

By Speaking Up, individuals allow us to take action to address their concerns, do the right thing and create a better workplace for everyone.

Responsibility for oversight of this Policy rests with the Audit Committee of the ABF Board.

WHY should you SPEAK UP?

ABF encourages an open culture in all its dealings with employees and other people with whom it comes into contact. Effective and honest communication is essential if incidences of inappropriate, improper, dishonest, illegal or dangerous behaviour are to be dealt with effectively.

By letting us know about your concerns, we can ensure that they are addressed appropriately and you can help us safeguard the interests of our staff, our organisation and the wider community.

WHO does SPEAK UP apply to?

We encourage all individuals working for ABF in any of our businesses in any country and in any capacity to Speak Up, including employees at all levels, directors, officers, part-time and fixed-term workers, casual and agency workers, seconded workers, volunteers, home workers, former workers, non-executive directors, job applicants and others engaged in the recruitment process, trainees, and those on work experience.

We also encourage third parties and their workers who either currently are, participating in an engagement process to become, or formerly have been, associated with ABF to Speak Up, including shareholders, suppliers, agents, contractors, subcontractors, external consultants, third-party representatives, business partners, those involved in pre-contractual negotiations, and sponsors.

All individuals working for ABF and third parties are welcome to use any of the reporting channels set out in this Policy.

WHAT should you SPEAK UP about?

If you have a genuine belief that inappropriate, improper, dishonest, illegal or dangerous behaviour is occurring, you can raise your concern in good faith in the confidence that we will support you.

The aim of the Speak Up programme is to provide a mechanism for reporting, investigating and remedying inappropriate behaviour which takes place in the context of work-related activities for ABF, or where an individual or individuals associated with ABF has done, is doing or is likely to do something which is inappropriate, improper, dishonest, illegal or dangerous. This includes:

- acting illegally;
- acting unethically;
- acting in breach of operating regulations;
- engaging in fraud;
- failing to comply with legal obligations;
- effecting a miscarriage of justice;
- endangering the health or the physical or moral integrity of an individual;
- causing damage to the environment;
- engaging in bribery or corruption;

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- facilitating tax evasion;
- engaging in human rights or modern slavery breaches;
- engaging in unauthorized disclosure of confidential information or other data breaches;
- breaching any ABF policy;
- discriminating against an individual;
- engaging in harassment, whether physical, sexual, psychological or otherwise;
- serious irregularities including in relation to the following:
 - accounting;
 - internal accounting control;
 - auditing;
 - banking and financial crimes;
 - infringement of intellectual property rights;
 - conflicts of interest; and
- deliberate concealment of any of the above.

This is not an exhaustive list, therefore if there is anything else that is causing you concern or you think we should be aware of, please do Speak Up.

Please be aware that Speak Up procedures are not a substitute for normal workplace grievance procedures or other relevant policies. In particular, you should not use the procedures outlined in this document to raise matters in relation to your personal circumstances exclusively, such as your terms and conditions of employment. If you are uncertain whether something is within the scope of this Policy, or if you would like to speak to someone in confidence prior to making a formal report, you should seek advice from any of the contacts identified below.

HOW do you SPEAK UP?

Option 1: Tell your line manager/head of department

If you are concerned about any form of inappropriate behaviour, you should feel able to raise it first with your line manager. This is the normal way in which we recommend you should first raise the issue. There is no special procedure for doing this – you can tell them about the problem (including by requesting a meeting in-person) or put it in writing if you prefer.

Option 2: Tell one of the alternative internal contacts

Alternatively, you can report your concerns to your Speak Up Officer or one of the Alternative Contacts identified below. Again, you can tell them about the problem (including by requesting a meeting in-person) or put it in writing if you prefer.

If you have reasonable grounds for believing that the Senior Leadership Team of your employing company or that the ABF board of directors may be involved or condoning the activity, you should first contact the Director of Legal Services of ABF whose contact details appear in the section 'Alternative Contacts' below.

Internal reporting is the best way to get information to the right people who can take early and effective action to resolve or avoid risks to the public interest. Whilst you may have the right to report externally (see Appendix 3 of this Policy which sets out external reporting channels in several countries), we encourage that this be considered as a last resort.

Option 3: Speak Up line or webservice

We would hope that you feel able to report your concerns to someone as described above. However, if the nature of the matter is such that you cannot raise it with any of the contacts identified or, if you have followed the internal channels listed in Options 1 and 2 and you still have concerns, you can contact the Speak Up phone line or webservice.

If you choose to phone the Speak Up line, you will hear a recorded message (in your local language) which asks you to provide the organisation code unique to your business. You are then able to record a voice message detailing your concern. In certain jurisdictions, your voice message will be used to create an audio file which you will be able to review, correct if necessary and confirm that it accurately reflects your report.

If you choose to use the Speak Up webservice, you will be given the opportunity to write a message detailing your concern. Text on the webservice is in your local language. A copy of any written message will be available on the webservice for review, and you are welcome to provide comments on your original message or additional information at any time.

Details of the local phone numbers, web addresses and organisation codes for Speak Up are available in Appendix 1 of this Policy.

We do not encourage anonymous reporting, but both the Speak Up line and webservice allow you to remain anonymous if you wish (subject to any local laws which prevent anonymous whistleblowing). Where an anonymous report is made, you should ensure that you provide sufficient detail to allow the matter to be investigated. Anonymous reports that provide insufficient information may not be capable of thorough investigation.

Reports through the Speak Up line or webservice will be passed to ABF and, if appropriate, will then be passed on to the appropriate person to be addressed in accordance with our Speak Up procedures.

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WHAT will happen next?

The same process will be followed no matter which channel you have chosen to report your concern.

Once you have reported your concern, your report will be acknowledged within 7 days and appropriate initial enquiries and an initial assessment of how to proceed will be carried out. This will be undertaken as quickly as possible. As part of this initial assessment you may be asked to provide additional information about your concern.

- If you have reported your concern to someone internally, you will be contacted by that person or another person appropriate to assist with the assessment. If you request a meeting to make or discuss your report, this will be set up within 14 days of the request. If you are asked to a meeting, you will be able to bring a colleague with you. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- If you have reported your concern through the Speak Up line or webservice, you will receive a unique case number. If you go back into the Speak Up line or webservice where you initially made your report and use this number, you will be able to listen/read the acknowledgement of your report (within 7 days), any requests for more information and any update on the status of your concern.

The initial assessment may lead to a formal investigation which, depending on what is found, will determine the action to be taken and the timescales involved.

You will be provided with feedback in relation to your report within 3 months following acknowledgment of report. Where possible, you will be informed of the outcome of any enquiries and investigations and any actions taken (subject to confidentiality requirements). Where it will not impede the investigation and is permitted by law, we will also endeavour to provide updates on the progress of your report as developments occur (subject to confidentiality requirements).

If your concern falls more properly within other policies (e.g. disciplinary or workplace grievance), your contact will tell you.

If you are unhappy with the response you receive, remember you can go to any of the other contacts detailed in this Policy. ABF is committed to ensuring any such issues are handled fairly and properly.

HOW will we protect you?

From repercussions

We will not tolerate the victimisation of anyone raising a genuine concern: we will ensure that you are supported and protected from adverse repercussions, retaliation or detriment.

Provided you have a reasonable belief that something inappropriate has occurred, is occurring or is likely to occur, it doesn't matter if you are mistaken.

Having raised your concern, the person to whom the disclosure has been made will, unless otherwise advised, act as your point of contact in the matter. Should you feel that there is any detriment to you or your career, as a result of raising the concern, this should be reported immediately to your contact or one of the other contacts listed in the section 'Alternative Contacts' below.

It is a disciplinary offence to threaten, treat detrimentally, or retaliate against those who Speak Up in any way.

It is also a disciplinary offence to raise an allegation maliciously or dishonestly.

Your identity

We hope you feel able to Speak Up openly. However, we will take all reasonable steps to keep your identity secret. We will only make your name known to those people who need to know it in order to investigate the allegation (and obtain your consent to this where required) or otherwise as required by law.

We do not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you and it may be more difficult to establish whether any allegations are credible.

If you wish to be completely anonymous, you can contact the Speak Up line. Anonymity is possible in countries where this is legally allowed. Sometimes this will depend on the nature of your concern.

Privacy

Any personal data that identifies you or another person obtained as part of any concern raised under this Policy will only be used for the purposes described in this Policy and in accordance with relevant data protection laws. See the Privacy Notice which is attached as Appendix 2 to this Policy for more information about how ABF handles personal data submitted through the Speak Up line and webservice, which applies in addition to any data protection policies or notices held locally.

Individuals whose data is handled through the Speak Up line and webservice have rights provided by data protection law as further explained in the applicable Privacy Notice.

Country specific requirements

Germany and Italy have specific rules around how to Speak Up set out in Appendix 4. Where the Appendix 4 guidance differs from what is set out in the main policy, the relevant guidance in Appendix 4 should be followed for Germany or Italy.

Other

Where required, this Policy has been agreed/implemented following consultation with the local Works Council.

Unless otherwise provided for by law, this Policy does not form part of any employee's contract of employment and we may amend it at any time.

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Alternative Contacts at ABF

Director of Financial Control, James Rushton,
Associated British Foods plc, Weston Centre,
10 Grosvenor Street, London W1K 4QY

Tel: +44 (0)20 7399 6567

Director of Legal Services, Paul Lister,
Associated British Foods plc, Weston Centre,
10 Grosvenor Street, London W1K 4QY

Tel: +44 (0)20 7399 6512

Chief People and Performance Officer, Sue Whalley,
Associated British Foods plc, Weston Centre
10 Grosvenor Street, London W1K 4QY

Tel: +44 (0)20 7399 6562

Head of Legal Services – Compliance, Julian Mieзитis,
Associated British Foods plc,
50-51 Russell Square, London WC1B 4JA

Tel: +44 (0)7921 290673

Appendix 1

SPEAK UP – CONTACT NUMBERS, WEB ADDRESSES AND ORGANISATION CODES

ABF Group

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Australia	+61 2 8284 6262	https://abf.speakup.report/abfgroup	123944
Cambodia	1800 209 867	https://abf.speakup.report/abfgroup	123944
China	400 120 1842	https://abf.speakup.report/abfgroup	123944
India	0008 0005 03159	https://abf.speakup.report/abfgroup	123944
Mexico	+52 55 4780 6198	https://abf.speakup.report/abfgroup	123944
Myanmar	0800 800 8062	https://abf.speakup.report/abfgroup	123944
United Kingdom	080 0022 4118	https://abf.speakup.report/abfgroup	123944
United States	+1 (669) 288 7154	https://abf.speakup.report/abfgroup	123944

Allied Milling and Baking

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
United Kingdom	080 0022 4118	https://abf.speakup.report/amb	123968

AB Agri

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Austria	0800 909 683	https://abf.speakup.report/abagri	123722
Bangladesh	+880 (0) 9610 998462	https://abf.speakup.report/abagri	123722
Belgium	0800 89 326	https://abf.speakup.report/abagri	123722
Brazil	+55 (11) 4700 8838	https://abf.speakup.report/abagri	123722
Bulgaria	800 210 0645	https://abf.speakup.report/abagri	123722
China	400 120 1842	https://abf.speakup.report/abagri	123722
Colombia	+57 601 242 1247	https://abf.speakup.report/abagri	123722
Czech Republic	800 050 833	https://abf.speakup.report/abagri	123722
Denmark	+45 43 31 09 61	https://abf.speakup.report/abagri	123722
Finland	0800 392 912	https://abf.speakup.report/abagri	123722
France	080 554 3753	https://abf.speakup.report/abagri	123722
Germany	0800 1818 952	https://abf.speakup.report/abagri	123722
Hungary	06 809 845 89	https://abf.speakup.report/abagri	123722
India	0008 0005 03159	https://abf.speakup.report/abagri	123722
Indonesia	+62 21 8063 0074	https://abf.speakup.report/abagri	123722

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AB Agri continued

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Ireland	1800 800 636	https://abf.speakup.report/abagri	123722
Italy	800 147 694	https://abf.speakup.report/abagri	123722
South Korea	+82 2 3700 5146	https://abf.speakup.report/abagri	123722
Malaysia	+60 3 7724 3136	https://abf.speakup.report/abagri	123722
Mexico	+52 55 4780 6198	https://abf.speakup.report/abagri	123722
Netherlands	+31 10 700 75 03	https://abf.speakup.report/abagri	123722
Philippines	1800 8394 8474	https://abf.speakup.report/abagri	123722
Poland	800012953	https://abf.speakup.report/abagri	123722
Portugal	800 831 302	https://abf.speakup.report/abagri	123722
Singapore	+65 6403 7051	https://abf.speakup.report/abagri	123722
Spain	+34 900 031 156	https://abf.speakup.report/abagri	123722
Thailand	+66 2 844 9693	https://abf.speakup.report/abagri	123722
Tunisia	+216 31 300 338	https://abf.speakup.report/abagri	123722
United Arab Emirates	800 0444 0408	https://abf.speakup.report/abagri	123722
United Kingdom	080 0022 4118	https://abf.speakup.report/abagri	123722
United States	+1 (669) 288 7154	https://abf.speakup.report/abagri	123722
Vietnam	+84 1900 3271	https://abf.speakup.report/abagri	123722

ABFI

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Australia	+61 2 8284 6262	https://abf.speakup.report/abfi	123778
Belgium	0800 89 326	https://abf.speakup.report/abfi	123778
Brazil	+55 (11) 4700 8838	https://abf.speakup.report/abfi	123778
Canada	+1 (514) 395 0496	https://abf.speakup.report/abfi	123778
China	400 120 1842	https://abf.speakup.report/abfi	123778
Finland	0800 392 912	https://abf.speakup.report/abfi	123778
France	080 554 3753	https://abf.speakup.report/abfi	123778
Germany	0800 1818 952	https://abf.speakup.report/abfi	123778
India	0008 0005 03159	https://abf.speakup.report/abfi	123778
Italy	800 147 694	https://abf.speakup.report/abfi	123778
Malaysia	+60 3 7724 3136	https://abf.speakup.report/abfi	123778

SPEAK UP POLICY CONTINUED

ABFI continued

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Mexico	+52 55 4780 6198	https://abf.speakup.report/abfi	123778
Netherlands	+31 10 700 75 03	https://abf.speakup.report/abfi	123778
New Zealand	+64 9 913 5892	https://abf.speakup.report/abfi	123778
Poland	800012953	https://abf.speakup.report/abfi	123778
Singapore	+65 6403 7051	https://abf.speakup.report/abfi	123778
Spain	+34 900 031 156	https://abf.speakup.report/abfi	123778
Sweden	020 160 4703	https://abf.speakup.report/abfi	123778
United Kingdom	080 0022 4118	https://abf.speakup.report/abfi	123778
United States	+1 (669) 288 7154	https://abf.speakup.report/abfi	123778

AB Mauri

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Argentina	+54 11 2039 7280	https://abf.speakup.report/abmauri	123815
Australia	+61 2 8284 6262	https://abf.speakup.report/abmauri	123815
Belgium	0800 89 326	https://abf.speakup.report/abmauri	123815
Brazil	+55 (11) 4700 8838	https://abf.speakup.report/abmauri	123815
Canada	+1 (514) 395 0496	https://abf.speakup.report/abmauri	123815
Chile	+56 22 483 5917	https://abf.speakup.report/abmauri	123815
China	400 120 1842	https://abf.speakup.report/abmauri	123815
Colombia	+57 601 242 1247	https://abf.speakup.report/abmauri	123815
Ecuador	1800 001 432	https://abf.speakup.report/abmauri	123815
France	080 554 3753	https://abf.speakup.report/abmauri	123815
India	0008 0005 03159	https://abf.speakup.report/abmauri	123815
Indonesia	+62 21 8063 0074	https://abf.speakup.report/abmauri	123815
Italy	800 147 694	https://abf.speakup.report/abmauri	123815
Malaysia	+60 3 7724 3136	https://abf.speakup.report/abmauri	123815
Mexico	+52 55 4780 6198	https://abf.speakup.report/abmauri	123815
Netherlands	+31 10 700 75 03	https://abf.speakup.report/abmauri	123815
New Zealand	+64 9 913 5892	https://abf.speakup.report/abmauri	123815
Pakistan	0080 0900 44437	https://abf.speakup.report/abmauri	123815
Peru	0800 74535	https://abf.speakup.report/abmauri	123815
Philippines	1800 8394 8474	https://abf.speakup.report/abmauri	123815

SPEAK UP POLICY CONTINUED

AB Mauri continued

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Portugal	800 831 302	https://abf.speakup.report/abmauri	123815
Spain	+34 900 031 156	https://abf.speakup.report/abmauri	123815
Sri Lanka	+94 (72) 091 0370	https://abf.speakup.report/abmauri	123815
Turkey	0080 04488 28602	https://abf.speakup.report/abmauri	123815
United Arab Emirates	800 0444 0408	https://abf.speakup.report/abmauri	123815
United Kingdom	080 0022 4118	https://abf.speakup.report/abmauri	123815
United States	+1 (669) 288 7154	https://abf.speakup.report/abmauri	123815
Uruguay	0004 1598 5762	https://abf.speakup.report/abmauri	123815
Venezuela	+58 212 335 7722	https://abf.speakup.report/abmauri	123815
Vietnam	+84 1900 3271	https://abf.speakup.report/abmauri	123815

AB Sports Nutrition

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
United Kingdom	080 0022 4118	https://abf.speakup.report/absportsnutrition	123848

ABF Sugar

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
China	400 120 1842	https://abf.speakup.report/abfsugar	123956
Eswatini	8007006	https://abf.speakup.report/abfsugar	123956
Malawi	847 (Airtel and TNM)	https://abf.speakup.report/abfsugar	123956
Malta	8006 5144	https://abf.speakup.report/abfsugar	123956
Mauritius	+230 5 297 0999	https://abf.speakup.report/abfsugar	123956
Mozambique	800112233 (TDM) 800333312 (Vodacom)	https://abf.speakup.report/abfsugar	123956
Netherlands	+31 10 700 75 03	https://abf.speakup.report/abfsugar	123956
Rwanda	N/A	https://abf.speakup.report/abfsugar	123956
South Africa	0800455686	https://abf.speakup.report/abfsugar	123956
Spain	+34 900 031 156	https://abf.speakup.report/abfsugar	123956
Tanzania	800780026 (Airtel, Vodacom and Tigo)	https://abf.speakup.report/abfsugar	123956
United Kingdom	080 0022 4118	https://abf.speakup.report/abfsugar	123956
United States	+1 (669) 288 7154	https://abf.speakup.report/abfsugar	123956
Zambia	260-971231250 (Airtel)	https://abf.speakup.report/abfsugar	123956

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AB World Foods

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Australia	+61 2 8284 6262	https://abf.speakup.report/abworldfoods	123757
Canada	+1 (514) 395 0496	https://abf.speakup.report/abworldfoods	123757
Mexico	+52 55 4780 6198	https://abf.speakup.report/abworldfoods	123757
Poland	800012953	https://abf.speakup.report/abworldfoods	123757
Thailand	+66 2 844 9693	https://abf.speakup.report/abworldfoods	123757
United Kingdom	080 0022 4118	https://abf.speakup.report/abworldfoods	123757
United States	+1 (669) 288 7154	https://abf.speakup.report/abworldfoods	123757

Acetum

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Italy	800 147 694	https://abf.speakup.report/acetum	123931
United States	+1 (669) 288 7154	https://abf.speakup.report/acetum	123931

ACH

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Canada	+1 (514) 395 0496	https://abf.speakup.report/ach	123907
Mexico	+52 55 4780 6198	https://abf.speakup.report/ach	123907
United States	+1 (669) 288 7154	https://abf.speakup.report/ach	123907

Grocery Central

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
United Kingdom	080 0022 4118	https://abf.speakup.report/grocerycentral	123804

GWF

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Australia	+61 2 8284 6262	https://abf.speakup.report/gwf	123826
New Zealand	+64 9 913 5892	https://abf.speakup.report/gwf	123826

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Jordans Dorset Ryvita

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Australia	+61 2 8284 6262	https://abf.speakup.report/jordansdorsetryvita	123870
Brazil	+55 (11) 4700 8838	https://abf.speakup.report/jordansdorsetryvita	123870
Canada	+1 (514) 395 0496	https://abf.speakup.report/jordansdorsetryvita	123870
France	080 554 3753	https://abf.speakup.report/jordansdorsetryvita	123870
United Kingdom	080 0022 4118	https://abf.speakup.report/jordansdorsetryvita	123870
United States	+1 (669) 288 7154	https://abf.speakup.report/jordansdorsetryvita	123870

Primark

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Austria	0800 909 683	https://abf.speakup.report/primark	123700
Bangladesh	+880 (0) 9610 998462	https://abf.speakup.report/primark	123700
Belgium	0800 89 326	https://abf.speakup.report/primark	123700
Cambodia	1800 209 867	https://abf.speakup.report/primark	123700
China	400 120 1842	https://abf.speakup.report/primark	123700
Czechia	800 050 833	https://abf.speakup.report/primark	123700
France	080 554 3753	https://abf.speakup.report/primark	123700
Germany	0800 1818 952	https://abf.speakup.report/primark	123700
Hungary	06 809 845 89	https://abf.speakup.report/primark	123700
India	0008 0005 03159	https://abf.speakup.report/primark	123700
Ireland	1800 800 636	https://abf.speakup.report/primark	123700
Italy	800 147 694	https://abf.speakup.report/primark	123700
Netherlands	+31 10 700 75 03	https://abf.speakup.report/primark	123700
Pakistan	0080 0900 44437	https://abf.speakup.report/primark	123700
Poland	800012953	https://abf.speakup.report/primark	123700
Portugal	800 831 302	https://abf.speakup.report/primark	123700
Romania	0800 400 653	https://abf.speakup.report/primark	123700
Slovak Republic	0800 113 418	https://abf.speakup.report/primark	123700
Slovenia	0800 83115	https://abf.speakup.report/primark	123700
Spain	+34 900 031 156	https://abf.speakup.report/primark	123700
Sri Lanka	+94 (72) 091 0370	https://abf.speakup.report/primark	123700
Turkey	0080 04488 28602	https://abf.speakup.report/primark	123700

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Primark continued

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
United Kingdom	080 0022 4118	https://abf.speakup.report/primark	123700
United States	+1 (669) 288 7154	https://abf.speakup.report/primark	123700
Vietnam	+84 1900 3271	https://abf.speakup.report/primark	123700

Speedibake

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
United Kingdom	080 0022 4118	https://abf.speakup.report/speedibake	123711

Silver Spoon

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
United Kingdom	080 0022 4118	https://abf.speakup.report/silverspoon	123837

Twinings

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Argentina	+54 11 2039 7280	https://abf.speakup.report/twiningsovo	123881
Australia	+61 2 8284 6262	https://abf.speakup.report/twiningsovo	123881
Bangladesh	+880 (0) 9610 998462	https://abf.speakup.report/twiningsovo	123881
Brazil	+55 (11) 4700 8838	https://abf.speakup.report/twiningsovo	123881
Canada	+1 (514) 395 0496	https://abf.speakup.report/twiningsovo	123881
China	400 120 1842	https://abf.speakup.report/twiningsovo	123881
France	080 554 3753	https://abf.speakup.report/twiningsovo	123881
Germany	0800 1818 952	https://abf.speakup.report/twiningsovo	123881
Hong Kong	+852 3019 4193	https://abf.speakup.report/twiningsovo	123881
India	0008 0005 03159	https://abf.speakup.report/twiningsovo	123881
Indonesia	+62 21 8063 0074	https://abf.speakup.report/twiningsovo	123881
Ireland	1800 800 636	https://abf.speakup.report/twiningsovo	123881
Italy	800 147 694	https://abf.speakup.report/twiningsovo	123881
Japan	+81 3 6627 0734	https://abf.speakup.report/twiningsovo	123881
Kenya	+254 20 765 0957	https://abf.speakup.report/twiningsovo	123881
Myanmar	0800 800 8062	https://abf.speakup.report/twiningsovo	123881
Nigeria	070 8060 1221	https://abf.speakup.report/twiningsovo	123881
Philippines	1800 8394 8474	https://abf.speakup.report/twiningsovo	123881

SPEAK UP POLICY CONTINUED

Twinings continued

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Poland	800012953	https://abf.speakup.report/twiningsovo	123881
South Africa	+27 (21) 427 7937	https://abf.speakup.report/twiningsovo	123881
Sri Lanka	+94 (72) 091 0370	https://abf.speakup.report/twiningsovo	123881
Sweden	020 160 4703	https://abf.speakup.report/twiningsovo	123881
Switzerland	080 000 5691	https://abf.speakup.report/twiningsovo	123881
Taiwan	+886 2 7743 8912	https://abf.speakup.report/twiningsovo	123881
Thailand	+66 2 844 9693	https://abf.speakup.report/twiningsovo	123881
United Arab Emirates	800 0444 0408	https://abf.speakup.report/twiningsovo	123881
United Kingdom	080 0022 4118	https://abf.speakup.report/twiningsovo	123881
United States	+1 (669) 288 7154	https://abf.speakup.report/twiningsovo	123881
Vietnam	+84 1900 3271	https://abf.speakup.report/twiningsovo	123881

Westmill

Country you are calling from	Telephone number (if available)	Webservice URL	Organisation code
Belgium	0800 89 326	https://abf.speakup.report/westmillfoods	123893
France	080 554 3753	https://abf.speakup.report/westmillfoods	123893
Germany	0800 1818 952	https://abf.speakup.report/westmillfoods	123893
Netherlands	+31 10 700 75 03	https://abf.speakup.report/westmillfoods	123893
United Kingdom	080 0022 4118	https://abf.speakup.report/westmillfoods	123893

Appendix 2

SPEAK UP – YOUR PRIVACY

We promote a culture of openness and encourage people to feel empowered to Speak Up. If any individual working at any level of the organisation becomes aware of anything they believe to be inappropriate, improper, dishonest, illegal or dangerous, (“**inappropriate behaviour**”) we want them to come forward and express their concerns.

We are committed to ensuring that we meet our obligations to explain how we collect and process personal data through Speak Up, in accordance with applicable data protection laws. This notice aims to do this.

For the purposes of European data protection legislation, the data controller with responsibility for any personal data collected both:

- i. when a concern is raised regarding inappropriate behaviour either to local line management, other internal channels, or where a concern is reported through the Speak Up phonenumber or webservice (collectively referred to in this notice as a “**report**”); and
- ii. during the handling of an investigation relating to such a report;

will be the employer of the person raising the concern. Where that person does not work for a member of the ABF group, the relevant data controller will be the ABF organisation with which, or about which, the person raises their concern.

What personal data do we process?

We will typically collect the name, title and contact details of the person making the report, as well as the name and relevant details of other individuals named in a report, together with a description of the conduct at issue and any questions or concerns raised by the reporter. Individuals who make a report through the ABF Speak Up phonenumber or webservice do not usually need to leave their name, save in limited jurisdictions where anonymous reporting is prohibited. However, we do encourage this, as concerns raised anonymously tend to be far less effective and if we do not have enough information, a full investigation may not be possible.

Where required under applicable laws, we will obtain the reporter’s consent to handle their personal data for the purposes set out in this notice and as described in the Speak Up Policy.

We encourage all reports to include sufficient and relevant detail to help us conduct a proper investigation into the matters being reported. We ask all reporters to bear this in mind and include information that is accurate and complete to the best of their knowledge.

Depending on the nature of the matter being reported, we may also collect certain sensitive personal information falling into “special categories” under some data protection laws and sometimes called “sensitive personal data”. This includes information relating to matters including racial or ethnic origin, religious beliefs, physical or mental health, trade union membership, sexual orientation, information regarding sexual life, biometric data, genetic data, criminal convictions and offences. Where necessary to comply with applicable law, we will seek your consent to process these categories of personal data.

We take steps to ensure the information we receive:

- is **accurate** – where practicable, reporters will be asked to review and confirm the information they have supplied when making their report;
- is **up to date** – we expect reporters to tell us if anything changes and if it does, we will track these changes in the documents we produce;
- is **limited to what is necessary** for our investigative purposes and to run our Speak Up procedure – we expect reporters to limit the information they provide only to that which is factual. Any personal data that is manifestly not useful for our purposes of investigating reports will not be collected or, if collected inadvertently, will be deleted immediately.
- is only **shared on a strict need-to-know** basis (see further **Who is this personal data shared with?** below).

Individuals who are implicated in a report may be notified of the matters at issue (unless doing so could compromise the investigation and to the extent permitted by applicable law), but we will treat the reporter’s identity as confidential, as further described in the “**Who is this personal data shared with?**” section below.

How do we use this personal data?

We will document the information we receive from reporters (which will be recorded with their agreement in accordance with applicable law) and where appropriate, will investigate any concerns or allegations raised and determine any action to be taken following a report. In certain cases, this may include enforcing our legal rights and obligations where legal claims are made by, against, or otherwise involving ABF workers. We will also keep the reporter informed regarding the progress and outcome of a report, in accordance with any local law requirements.

We may also create anonymised reports to allow us to keep an overview of any trends or areas of concern where further training or other steps may be needed in relation to how ABF’s Speak Up programme operates.

SPEAK UP POLICY CONTINUED

What is our lawful basis to use this personal data?

This section applies in countries (principally in Europe) which require us to specify the lawful basis we rely on to process personal data.

Personal data contained in reports will be used by us in order to comply with a legal obligation (for example, an obligation under local “whistleblowing” laws), or otherwise because it is necessary for our legitimate interests to understand and investigate inappropriate behaviours. We have a legitimate interest in ensuring that our business, customers and employees are protected from unlawful, unethical and / or inappropriate activity in line with our corporate values and codes of conduct.

Where a report includes special categories of personal data and/or personal data regarding criminal convictions or offences, we only use this data where it is permissible to do so in accordance with applicable laws as follows:

- In respect of the use of special categories of personal data where the processing is:
 - necessary for carrying out our obligations in the field of employment law (where safeguards are in place to protect privacy and other fundamental rights); and/or
 - necessary for the establishment or defence of legal claims; and
- In respect of information relating to criminal offences or allegations:
 - where we are permitted to do so under local law.

We will obtain your consent where we need to do so in order to comply with applicable laws, for example, for recording a report you make on a via our Speak Up phonenumber.

Who is this personal data shared with?

We have rigorous governance processes to ensure that we only share reports on a strict need to know basis, maintaining confidentiality to the highest standards. To give assurance that individuals are able to speak up freely, we take all reasonable steps to keep a reporter’s identity confidential. We will only share the reporter’s name and the names of others mentioned in the report with our service providers and with those people who need to know it in order to investigate any allegations and only where permitted under applicable law. If we need to share personal information of the reporter for legal purposes (e.g. to judicial or law enforcement authorities), we will usually tell the reporter first, unless doing so could compromise the legal proceedings or investigation. Be assured that if we do need to share personal details with judicial or law enforcement authorities, they will have to comply with their own local data protection rules.

Investigations into concerns raised in a report will usually be led by the employer of the reporter, or where that person does not work for a member of the ABF group, the investigation will be led by the ABF company with which, or about which, the report is made. Depending on the nature of the issue and in accordance with the Speak Up Policy, that company may need to escalate it to the divisional HQ and / or ABF (as appropriate). In doing so, they may need to share personal data which is strictly necessary for the purposes of proper handling and investigation of the issue but only to the extent permitted under applicable laws.

The decision as to what information is shared, and with whom, will depend on (i) the nature of the circumstances described in the report; (ii) the proper conduct of any investigation required; and (iii) local laws we need to comply with in the relevant country.

See below for any additional requirements which apply in your local jurisdiction.

Could personal data be transferred internationally?

As explained above, whilst investigations will be led by the organisation to which a report is made or is about, there may be circumstances in which it is necessary to escalate to ABF in the United Kingdom and / or to the divisional HQ for the business, which may be located in a different jurisdiction to your own. In addition, reports submitted through the Speak Up phonenumber or webservice will be stored on our supplier’s servers in the Netherlands, Europe. Wherever personal data is transferred to another country, we take steps to ensure that your privacy rights are respected and ensure that adequate safeguards are in place.

How long do we keep this personal data?

Initial voice recordings are deleted once transcripts or minutes of meetings are created and then such records will be retained within the Speak Up case management system. This is the same for reports made through the webservice.

We will retain all data processed as part of a report or investigation in our Speak Up case management system for 3 years after the report / investigation has been completed and will then be deleted, unless:

- i. a different period is required under local laws and / or
- ii. disciplinary or litigation proceedings are commenced, in which case the personal data will be retained to account for any local statutory time limits for appeals.

Statistical records of the type of report, the location and the outcome of the investigation (with no personally identifiable information) will be retained longer for internal reporting purposes.

Where is this personal data held?

Personal data processed in relation to Speak Up is stored in a secure case management system. We use a third-party service provider to provide the Speak Up service and we have put in place robust contractual and technical measures to ensure the security of data when it is in their hands.

SPEAK UP POLICY CONTINUED

Your rights

- You can ask us at any time to provide you with a copy of your personal data.
- If you think the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it or complete it.
- In some circumstances, you have the right to object to our use of your data and the right to ask us to restrict our use of your data or to delete it.
- If we rely on your consent for any purpose set out in this notice, you have the right to withdraw it, but this shall not affect any processing of your personal data before that withdrawal.

However, there are some exceptions to these rights. For example, it will not be possible for us to delete your data if we are required by law to keep it or if we need to use it in order to establish or defend a legal claim.

If you wish to access your personal data or exercise any of your rights, if you work for ABF, you should contact your local data protection coordinator and if you are outside of ABF, you should contact legal.inbox@abfoods.com. If you have a concern about the way we handle your information you have the right to complain to your local data protection supervisory authority.

See below for additional specific requirements which apply in your local jurisdiction.

Jurisdiction-specific additional requirements

Please note: This section provides specific guidance which applies in certain jurisdictions. If there is any conflict between this section and the information above, this section shall apply.

Austria

How long do we keep this personal data?

Personal data will be processed for the time strictly necessary in order to handle the report and will be kept for 5 years following communication of the final outcome of the procedure (except for log data which will be kept for 8 years following communication of the final outcome of the procedure), unless a longer period is required for legal proceedings; to handle requests from competent authorities; or under applicable laws. After this period, the personal data will be deleted or irreversibly anonymised.

Belgium

Who is the personal data shared with?

If we need to share personal data with third parties outside of the investigation team (save as required by law), we will seek the reporter's consent.

How long do we keep this personal data?

Reports must be retained for five years from the end of the employment relationship (if the reporter is an employee), or five years from the date of the report, for reports made by other individuals.

China

Who is this personal data shared with

If you would like to know further details about the third party data controllers who process your personal data for independent purposes and means and / or the overseas recipients outside of China, please contact us at:

Shanghai ABF (TwO): email address: dpc@abf.cn

AB Agri China: email address: hr@abagrichina.com

ABF China Holding: email address: dpc@abfchina.com

Primark Ethical: email address: dpc@abfchina.com

AB Enzymes China: vicky.xu@abenzymes.com

Czech Republic

How long do we keep this personal data?

The report, and documents relating to the report, must be retained for a period of 5 years from the date of receipt of the report, except where a longer period is required for legal proceedings; to handle requests from competent authorities; or under applicable laws. After this period, personal data will be deleted or irreversibly anonymised.

Finland

How long do we keep this personal data?

Reports must be retained for a period of 5 years from the date of receipt of the report, except where a longer period is required for legal proceedings; to handle requests from competent authorities; or under applicable laws. After this period, the personal data will be deleted or irreversibly anonymised.

SPEAK UP POLICY CONTINUED

France

Who is this personal data shared with?

If we need to share personal data with third parties outside of the investigation team (save as required by law), we will seek the reporter's consent.

To the extent required for the investigation of your report and in accordance with the Speak Up Policy and Privacy Notice, your report may be handled by the following persons:

- Speak Up Officer(s) named in your Speak Up Policy
- Your local data protection coordinator
- Any of the contacts to which you can make a report, including Paul Lister, James Rushton, Sue Whalley and Julian Mieztis
- Legal, Audit and HR teams of ABF
- Legal, Audit and HR teams in the ABF company with which, or about which, the report is made
- Legal, Audit and HR teams in the Divisional HQ of the ABF company with which, or about which, the report is made
- Depending on the nature of your concern, for the purposes of investigation, it may be necessary to involve other individuals from relevant departments in ABF, the ABF company with which, or about which, the report is made, or the Divisional HQ of the ABF company with which, or about which, the report is made. These individuals will handle the report in accordance with the Speak Up Privacy Notice.

Germany

Who is the personal data shared with?

In accordance with local German law, we ensure that HR personnel are not involved in any investigation, unless due to the nature of the circumstances, it is necessary to do so.

How long do we keep the personal data?

All documentation is deleted three years after the conclusion of a report and / or investigation, unless it is necessary to keep the information for longer under applicable laws.

Italy

Who is this personal data shared with?

In circumstances where a report is escalated to the divisional HQ and / or ABF, the ABF company that is the employer of the person making the report will still liaise directly with the reporter.

How long do we keep this personal data?

Personal data will be processed for the time strictly necessary in order to handle the report and will be kept for 5 years following communication of the final outcome of the procedure, except where a longer period is required for legal proceedings; to handle requests from competent authorities; or under applicable laws. After this period, the personal data will be deleted or irreversibly anonymised.

Peru

The ABF company responsible for dealing with your personal data in connection with a Speak Up report will be the employer of the person raising the concern. Where that person does not work for a member of the ABF group, the relevant data controller will be the ABF organisation with which, or about which, the person raises their concern.

More information

If you consider that you have not been duly attended to in the exercise of your rights, you may file a complaint with the National Authority for the Protection of Personal Data, by contacting the Mesa de Partes of the Ministry of Justice and Human Rights: Scipión Llona 350 Street, district of Miraflores, province and department of Lima, Peru, by filling out the form published at this [link](#).

Portugal

How long do we keep this personal data?

The report and documents relating to the report must be retained for a period of 5 years, except where a longer period is required for legal proceedings; to handle requests from competent authorities; or under applicable laws. After this period, the personal data will be deleted or irreversibly anonymised.

SPEAK UP POLICY CONTINUED

Romania

How long do we keep this personal data?

The report and documents relating to the report (e.g. transcripts / records) must be retained for a period of 5 years, except where a longer period is required for legal proceedings; to handle requests from competent authorities; or under applicable laws. After this period, the personal data will be deleted or irreversibly anonymised.

Who is this personal data shared with?

To the extent required for the investigation of your report and in accordance with the Speak Up Policy and Privacy Notice, your report may be handled by the following persons:

- Speak Up Officer(s) named in your Speak Up Policy
- Your local data protection coordinator
- Any of the contacts to which you can make a report, including Paul Lister, James Rushton, Sue Whalley and Julian Mieztis
- Legal, Audit and HR teams of ABF
- Legal, Audit and HR teams in the ABF company with which, or about which, the report is made
- Legal, Audit and HR teams in the Divisional HQ of the ABF company with which, or about which, the report is made
- Depending on the nature of your concern, for the purposes of investigation, it may be necessary to involve other individuals from relevant departments in ABF, the ABF company with which, or about which, the report is made, or the Divisional HQ of the ABF company with which, or about which, the report is made. These individuals will handle the report in accordance with the Speak Up Privacy Notice.

Slovenia

How long do we keep this personal data?

Personal data contained within reports will be kept for 5 years from the end of the procedure.

South Africa

The ABF company responsible for dealing with your personal data in connection with a Speak Up report will be ABF Sugar Proprietary Limited, 1 Nokwe Avenue, Ridgeside, Umhlanga Rocks, Durban, South Africa, PO Box 194, Durban, South Africa, 4000

More information

You can ask us at any time to provide you with a copy of your personal data. If you think the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it or complete it. In some circumstances you also have the right to object to our use of your data. If you have a concern about the way we handle your information you have the right to complain to the Information Regulator who can be contacted at: enquiries@inforegulator.org.za.

Spain

Who is this personal data shared with?

In accordance with national legislation, the only parties who will have access to the personal data relating to a report include:

- the formal head of the scheme;
- the operational manager of the scheme;
- the Head of HR or equivalent (but only if disciplinary measures may apply in the particular circumstance);
- the Head of Legal (but only if legal measures should be adopted regarding the facts reported);
- appointed data processors;
- the DPO;
- other people whose intervention may be strictly and demonstrably necessary to adopt corrective measures or for progressing disciplinary or criminal law procedures.

How long do we keep this personal data?

In cases where no action has been taken in relation to a report, all personal data contained in the report shall be deleted within three months.

SPEAK UP POLICY CONTINUED

Tanzania

Anonymous reporting is not permitted.

Turkey

How do we use this personal data?

Personal data contained in reports will be used by us only where it is necessary for our legitimate interests to understand and investigate inappropriate behaviours. We have a legitimate interest in ensuring that our business, customers and employees are protected from unlawful, unethical and / or inappropriate activity in line with our corporate values and codes of conduct.

Where a report includes special categories of personal data and/or personal data regarding criminal convictions or offences, we only use this data where it is permissible to do so in accordance with data protection laws, and if your explicit consent is required, we will obtain it.

More information

You can ask us at any time to provide you with a copy of your personal data. If you think the personal data we hold about you is inaccurate or incomplete, you can ask us to correct it or complete it. In some circumstances you also have the right to object to our use of your data or have it erased.

Appendix 3

SPEAK UP – EXTERNAL REPORTING CHANNELS

If your jurisdiction is not listed below, please check locally for any relevant external reporting channels.

Belgium

a. The authorities responsible for receiving reports, reporting feedback, and providing follow-up on external reports are the following:

- The Federal Public Service of Finance;
- The Federal Public Service Employment, Labor and Social Dialogue;
- The Belgian Competition Authority;
- The Data Protection Authority;
- The authorities reported in article 85 of the Act of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash;
- The National Institute for Health and Disability Insurance;
- The National Institute for Social Security for the Self-Employed;
- The National Employment Service;
- The National Office of Social Security;
- The Autonomous Anti-Fraud Coordination Service;

Further details on how to make an external report with these competent authorities can be found on their respective websites.

b. The Federal Ombudsman is responsible for coordinating external reports in the private sector. For further information regarding the Federal Ombudsman, please visit the following website: www.federaalombudsman.be. Through the website you can externally report either by:

- reporting via the notification form available on the website;
- sending an email to integriteit@federaalombudsman.be; or
- making an appointment by sending an email to integriteit@federaalombudsman.be or calling 0800 999 61

The Czech Republic

The external authority designated to receive reports related to the topics above is the Ministry of Justice. The contact details are:

- By phone: 00 420 221 997 840
- By email: oznamovatel@mzp.justice.cz
- Online: <https://oznamovatel.justice.cz/chci-podat-oznameni/>

Denmark

You may wish to report to an external reporting channel where you believe that your report will not be handled properly or that you will likely be retaliated against. You may consider reporting a matter to The National Whistleblower Scheme – please see <https://whistleblower.dk> for further information.

On <https://whistleblower.dk/om-ordningen/andre-ordninger>, you can find information on other options for reporting specific matters, e.g., to the Danish Financial Supervisory Authority, the Danish Business Authority, The Danish Ministry of Justice or The Danish Ministry of Defence.

France

You may consider reporting the matter to specific external authorities. The French Defender of Rights (Défenseur des Droits) will guide you toward the appropriate authority, unless it is itself competent to process your report. Défenseur des Droits can be contacted:

- By post, free of charge without postage: Défenseur des droits – Libre réponse 71120 – 75342 Paris CEDEX 07.
- By filling in the online form at: defenseurdesdroits.fr / “Saisir le Défenseur des droits” (make a referral to the Defender of Rights).
- By telephone on +33 (0)9 69 39 00 00, from Monday to Friday between 8:30am and 7:30pm (cost of a local call).

More information can be found in English and French on its website at www.defenseurdesdroits.fr.

SPEAK UP POLICY CONTINUED

Germany

A report may be submitted externally to the Federal Office of Justice, and in special cases also to the Federal Financial Supervisory Authority and to the Federal Cartel Office. There are other external reporting offices at European level.

Ireland

You may consider reporting the matter to a 'prescribed person' or the Protected Disclosures Commissioner. A list of 'prescribed persons' is available at <https://www.gov.ie/en/collection/41798-protected-disclosures-whistleblowing-list-of-prescribed-persons/?referrer=http://www.gov.ie/prescribed-persons/>.

Protected Disclosures Commissioner:

- By phone: 01 639 5650
- By email: General enquiries: info@opdc.ie. To report a wrongdoing – disclosures@opdc.ie
- By post: Office of the Protected Disclosures Commissioner, 6 Earlsfort Terrace, Dublin 2, D02 W773, Ireland

Depending on the nature of the concern you may want to make a report to an institution, body, office or agency of the European Union.

The Netherlands

The authorities responsible for receiving reports, reporting feedback, and providing follow-up on external reports are the following:

- The Whistleblowers Authority (het Huis) (www.huisvoorklokkenluiders.nl).
- The Netherlands Authority for Consumers & Markets (de Autoriteit Consument en Markt) (www.acm.nl).
- The Dutch Data Protection Authority (de Autoriteit persoonsgegevens) (www.autoriteitpersoonsgegevens.nl).
- The Labour Inspectorate (www.nlarbeidsinspectie.nl/).

You can contact any of the internal contacts identified in this Policy if you are uncertain whether you should report something and where to do so, but if you wish to speak to an external advisor then you could seek advice from 'The Whistleblowers Authority' (contact details above) or a person of your own choice.

Romania

The main authority responsible for receiving reports, reporting feedback, and providing follow-up on external reports is the Romanian National Agency for Integrity (in Romanian, Agentia Nationala pentru Integritate) – contactable as follows:

- By phone: +40 372 069 869
- By email: avertizari@integritate.eu
- Website: <https://avertizori.integritate.eu>
- By post: Agentia Nationala pentru Integritate, 15 Lascar Catargiu Blvd., postal code: 010661, district 1, Bucharest – Romania

Slovak Republic

The external authority designated to receive reports related to the antisocial activity is the Whistleblower Protection Office of the Slovak Republic ("Authority"). The contact details are:

- By electronic means: <https://formular.oznamovatelia.sk/form/mail>
- By post/In person: Námestie slobody 29, 811 06 Bratislava, Slovak Republic (temporary address: Jozefská 1, 811 06 Bratislava, Slovak Republic)

The report may also be submitted through external channels or through another authority competent to receive the report, which is in addition to the Authority:

- the Public Prosecutor's Office,
- the administrative authority competent to deal with an administrative offence constituting a serious antisocial activity,
- the competent institution, body, office, or agency of the European Union.

Where reports involve serious antisocial activity (e.g. where it could have broader societal impacts), reporters can apply for preventative protection to the prosecutor or competent administrative authority on the Protection of Whistleblowers of Antisocial Activity. If a reporter believes that employment action has been taken against them in connection with their report, they may also apply to the Authority for the suspension of the effectiveness of such action.

SPEAK UP POLICY CONTINUED

Slovenia

The procedure and bodies for external reporting are defined by the Slovenian Whistleblower Protection Act (*Zakon o zaščiti prijaviteljev*). Below are some of the state institutions that are responsible for receiving and handling the external reports:

- The Slovenian Competition Protection Agency (*Javna agencija Republike Slovenije za varstvo konkurence*),
- The Financial Administration of the Republic of Slovenia (*Finančna uprava Republike Slovenije*),
- The Market Inspectorate of the Republic of Slovenia (*Tržni inšpektorat Republike Slovenije*),
- Office for Money Laundering Prevention of the Republic of Slovenia (*Urad Republike Slovenije za preprečevanje pranja denarja*),
- The Information Commissioner (*Informacijski pooblaščenec*),
- The Information Security Inspectorate (*Inšpekcija za informacijsko varnost*),
- The Labour Inspectorate of the Republic of Slovenia (*Inšpektorat Republike Slovenije za delo*),
- The Commission for the prevention of Corruption (*Komisija za preprečevanje korupcije*).

Spain

You may consider reporting the matter to the Andalusian Office against Fraud and Corruption (*Oficina Andaluza contra el Fraude y la Corrupción*) if you are assigned to the work centre of Cordoba, or to the Catalanian Antifraud Office (*Oficina Antifrau de Catalunya*) if you are assigned to the work centre of Barcelona until the Independent Whistleblower Protection Authority (*Autoridad Independiente de Protección al Informante*) is constituted, which shall apply at a national level.

If you are not assigned to one of the work centres mentioned above, the Independent Whistleblower Protection Authority (*Autoridad Independiente de Protección al Informante*) shall be applicable to you, regardless the work centre you are assigned to, as soon as it has been constituted, in accordance with the provisions of the Law 2/2023, of 20 February, on the protection of persons who report regulatory infringements and the fight against corruption.

In line with the above, contact details of the regional applicable authorities as at the date of this Speak Up Policy are as follows:

Andalusian Office against Fraud and Corruption (*Oficina Andaluza contra el Fraude y la Corrupción*)

- By phone: (+34) 854 53 94 82;
- By email: antifraudeandalucia@antifraudeandalucia.es
- By post: Avenida San Francisco Javier, 15, 3ª planta, edificio Capitolio, 41005 Sevilla; and
- By electronic means: <https://buzon.antifraudeandalucia.es/#/>

Catalonian Antifraud Office (*Oficina Antifrau de Catalunya, OAC*):

- By phone: (+34) 935 545 555;
- By email: analisi@antifrau.cat (in this case, a specific form must be filled);
- By post: Calle Ribes, 1-3, 08013 Barcelona; and
- By electronic means: <https://denunciesanonimes.antifrau.cat/#/?lang=es>

Depending on the nature of the concern you may want to make a report to an institution, body, office or agency of the European Union.

Appendix 4

SECTION A: GERMANY – SUPPLEMENT TO THE SPEAK UP POLICY

This section A of Appendix 4 supplements the Speak Up Policy in Germany. If you are making a report from Germany, please review the information below beforehand which covers your specific statutory rights under German law.

If you make a report in line with the Speak Up Policy above, ABF will protect you in the way set out in the Speak Up Policy. However, statutory protections offered under German law will only apply in the way set out below.

Reportable breaches

Notwithstanding the policy statements above, types of inappropriate behaviour that may be reported pursuant to Speak Up under the Whistleblower Protection Act in Germany are as follows:

- Violations that are punishable by law (e.g. fraud, bribery, corruption, competition violations, extortion, insider trading and other securities fraud, money laundering, tax evasion, endangering the health or physical integrity of a person or sexual harassment).
- Violations that are subject to a fine, insofar as the violated regulation serves to protect life, limb or health or to protect the rights of employees or their representative bodies,
- Infringements of federal and state legislation and directly applicable EU legal acts, e.g. in the areas of
 - Public procurement, prevention of money laundering and terrorist financing;
 - Product safety and compliance;
 - Environmental protection and environmental damage prevention;
 - Food and feed safety
 - Quality and safety standards for organs and substances of human origin, human and veterinary medicines, medical devices and cross-border patient care;
 - Human rights abuses and modern slavery;
 - Consumer protection; and
 - Unauthorised disclosure of confidential information or other data breaches;
- Relevant violations of federal and uniformly applicable regulations for contracting authorities for the award of public contracts and concessions,
- Violations of EU internal market regulations, including violations of competition and state aid regulations as well as regulations on corporate taxation, including any tax agreements.

A list of all matters covered by the Whistleblower Protection Act in Germany can be found in Section 2 of the Whistleblower Protection Act, which you can access here (<https://www.recht.bund.de/bgbl/1/2023/140/VO>).

Feedback

You will be informed of the outcome of any enquiries and investigations and any actions planned or taken and reasons for such actions (subject to confidentiality requirements).

SECTION B: ITALY – SUPPLEMENT TO THE SPEAK UP POLICY

This section B of Appendix 4 supplements the Speak Up Policy in Italy. If you are making a report from Italy, please review the information below beforehand which covers your specific statutory rights under Italian law.

If you make a report in line with the Speak Up Policy above, ABF will protect you in the way set out in the Speak Up Policy. However, statutory protections offered under Italian law will only apply in the way set out below.

Reportable breaches

Notwithstanding the policy statements above, the information on breaches that may be reported pursuant to the Italian Legislative Decree No. 24/2023 on Whistleblowing (in order to benefit from the measures statutorily provided for thereof) are the following:

- breaches of EU or national acts (including those implementing EU law) relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data, and security of network and information systems;

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- acts or omissions constituting fraud or other illegal activity detrimental to EU financial interests as set out in Article 325 of the TFEU and detailed in EU relevant secondary legislation;
- acts or omissions affecting EU internal market compromising the free movement of goods, persons, services and capital, including breaches of EU antitrust provisions, State aids and corporate tax rules, as well as any mechanism aimed at obtaining a tax advantage which frustrates the object or purpose of the applicable corporate tax law; and
- unlawful behaviors relevant under the Italian Legislative Decree No. 231/2001 on Corporate Liability (i.e., constituting one or more offences under the catalogue of offences entailing corporate liability) or (ii) breaches of the Organisation, Management and Control Model adopted pursuant to the above Decree (i.e., constituting violation of rules of conduct and/or principles of controls referred to in the above Model).]

External Reporting Channel

Only in the cases set out below you may considering using the external reporting channel made available by the National Anti-Corruption Authority ("ANAC")¹ to report on the following potential breaches:

- breaches of EU or national acts (including those implementing EU law) relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and personal data, and security of network and information systems;
- acts or omissions constituting fraud or other illegal activity detrimental to EU financial interests, as set out under applicable laws²;
- acts or omissions affecting EU internal market compromising the free movement of goods, persons, services and capital, including breaches of EU antitrust provisions, State aid and corporate tax rules, as well as any mechanism aimed at obtaining a tax advantage which frustrates the object or purpose of the applicable corporate tax law;

In particular, for the breaches detailed above, you may submit an external report addressed to ANAC only if one of the following specific conditions is met;

- the internal reporting channel is not active or, even if active, does not comply with the provisions set forth by the Italian Legislative Decree No. 24/2023 on Whistleblowing, as it is not suitable to guarantee the obligations of confidentiality of involved persons;
- you have already submitted a report via the internal reporting channels, and it was not followed up;
- you have well-founded reasons to believe that, if you made a report via the internal reporting channels, it would not be effectively followed up, or that the same report might lead to the risk of retaliation;
- you have well-founded reasons to believe that the breach may constitute an imminent or manifest danger to the public interest.

Confidentiality

ABF ensures the confidentiality of the report in accordance with the Italian Legislative Decree No. 24/2023 on Whistleblowing and the relevant applicable regulations.

Throughout the entire process of managing reports, ABF will ensure the confidentiality and integrity of all the information contained in the report and in its attached documentation – and, in particular, the confidentiality of your identity, of the person to whom the reported facts refer and of the other persons anyway mentioned in the report – securing that access to the aforesaid information is exclusively by the subjects competent to receive and follow up the reports, authorized for this purpose in accordance with the relevant laws and regulations (also on the processing of personal data).

In particular, your identity – and any other information from which the same may be inferred, directly or indirectly – shall not be disclosed without your express consent, except in the cases, according to the methods and in compliance with the guarantees provided by the Italian Legislative Decree No. 24/2023 on Whistleblowing and relevant applicable regulations.

It is a disciplinary offence to breach the confidentiality obligations referred to above.

Protection against retaliation and support measures

Any behaviour, act, or omission (e.g., suspension, dismissal, demotion, etc.), even if merely attempted or threatened, carried out as a consequence of the report, which causes or may cause, directly or indirectly, unjustified damage to you will not be tolerated and will be and will be subject to the consequences provided for in the Italian Legislative Decree No. 24/2023 on Whistleblowing.

The protection against retaliation also apply to the person assisting you in making the report (so called facilitator), to persons – working with you – related to you by a stable emotional or kinship relationship up to the fourth degree, to your work colleagues having a regular and ongoing relationship with you, entities you own or for which you work, as well as entities operating in the same work context as you.

Notwithstanding the policy statements, you (as well as the other protect subjects mentioned above) may report to ANAC any retaliation you believe you have suffered.

A list of entities providing you with support measures is established at ANAC website. The support measures consist of cost-free information, assistance and advice about procedures for submitting reports, protection measures offered by national and EU legislative provisions, rights of the person involved, as well as terms and conditions of access to legal aid.

1. Whistleblowing - www.anticorruzione.it.

2. As set out in Article 325 of the TFEU and detailed in EU relevant secondary legislation.