

HR - Global Whistleblowing Policy

Process owner:

Global HR

Process:

Corporate guidelines

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1

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Outstanding

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1. Purpose

The Whistleblowing policy (confidential reporting) refers to the reporting by employees of suspected misconduct, illegal acts or failure to act within FoodChain ID. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of FoodChain ID's work to come forward and voice those concerns.

1.1 What is whistleblowing?

Employees are often the first to realize that there may be something seriously wrong within the company. 'Whistleblowing' is viewed by FoodChain ID as a positive act that can make a valuable contribution to the company's efficiency and long-term success. It is not disloyal to colleagues or the company to speak up.

If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimization, retaliation and harassment
- how to raise a concern, and
- what the company will do.

1.2 Internal and external notification

FoodChain ID encourages you to raise your concern internally, in accordance with this policy. However, even though FoodChain ID encourages you to raise your concern internally, you are always able to notify the public authorities in your country.

2. Scope

2.1 Scope of this Policy

This Policy is intended to enable those who become aware of wrongdoing in the company affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Policy is not intended to replace existing procedures, e.g. if your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures with your local HR responsible.

2.2 Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the company without fear of victimization, subsequent discrimination, disadvantage, or dismissal.

It is also intended to encourage and enable you to raise serious concerns **within** the company rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimization if you have made any disclosure in good faith.

2.3. Who can raise a concern under this Policy?

The Policy applies to all:

- employees of any FoodChain ID legal entity
- temporary employees (including interns) of any FoodChain ID legal entity
- contractors through agencies working for a FoodChain ID legal entity
- those providing services under a contract or other agreement with a FoodChain ID legal entity in our premises
- those who are participating in labor market initiatives without being an employee.
- those who, for the purpose of education and training or in connection with work-related initiatives, are assigned to a company without being an employee.

2.4. What should be reported?

Any serious concerns that you have about the conduct of employees of FoodChain ID or others acting on behalf of FoodChain ID that:

- make you feel uncomfortable in terms of known standards;

- are not in keeping with the company policies or procedures;
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- breaches of statutory obligations (e.g. racial, sexual, disability or other discrimination, corruption, bullying, harassment, confidentiality breach)
- breaches of company's internal guidelines (e.g. Code of Conduct, HR Privacy Policy)
- health and safety of the public and/or other employees
- unjustifiable working environment
- the security of personal information
- abuse of public authority
- damage to the environment
- unauthorized use of corporate funds or other assets
- possible fraud and corruption
- other unethical conduct.

This list is not exhaustive.

3. Protecting the Whistleblower

3.1. Your legal rights

This policy has been written to take account local law which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the laws provisions and in the public interest.

Regulations make it unlawful for FoodChain ID to dismiss anyone or allow them to be victimized on the basis that they have made an appropriate lawful disclosure in accordance with local law.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. FoodChain ID cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

3.2. Harassment or Victimization

FoodChain ID is committed to good practice and high standards and to being supportive of you as an employee.

The company recognizes that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and your colleagues.

FoodChain ID will not tolerate any harassment or victimization of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

Examples of retaliation that a whistle-blower is protected against in FoodChain ID is:

- that the employee does not experience a normal progression in his/her pay and employment conditions (change in work tasks, re-assigned to new tasks, demotion).
- that the employee does not experience a normal progression in his/her tasks at work
- various forms of bullying/ harassment/ freezing out / threats / discrimination
- suspension, warning letter, dismissal with or without notice

3.3. Support to you

Being the whistleblower, or the person who is alleged for misconduct, can be a huge burden. While investigations are ongoing, both parties must be taken care of and protected in the best possible way.

Throughout this process:

- your concerns will be taken seriously
- you will be given support from senior management, and
- the company will do all it can to help you throughout the investigation

For those who are not employees of FoodChain ID, the company will endeavor to provide appropriate advice and support wherever possible.

3.4. Confidentiality & Anonymity

Those involved in the processing of the concern must uphold confidentiality throughout the process. Involvement of several parties should be limited and on a case to case basis, depending on the severity of the breach.

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

3.5. Anonymous Allegations

You may always notify anonymously, however this Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to give you feedback. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the company. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

If an employee does not wish to waive anonymity, it is better to give notice anonymously than not to give notice at all.

3.6. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the company will recognize your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

4. Raising a Concern

4.1. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise the concern through our dedicated Whistleblowing tool as outlined under 4.2. You can otherwise raise concerns with your Line Manager, alternatively local HR if it is not appropriate to notify your line manager. If it is not suitable to notify HR at local HR level or VP level, you may notify the Chief People Officer (CPO).

If, exceptionally, the concern is about the CEO of FoodChain ID, your concern should be raised with Berkshire Partners who will decide how the investigation will proceed. This may include external investigation.

4.2. How to raise a concern

FoodChain ID uses the NAVEX whistleblowing tool to ensure a proper handling of raised cases.

You may raise your concern by telephone, web intake, a mobile intake. The earlier you express your concern, the easier it is to take action. A disclosure should contain a factual, objective and specific description of the alleged wrongdoing or other cause for concern. The following details should be included:

- What has happened (breach of laws and regulations, violation of ethical norms or internal guidelines).
- Where it happened.
- When it happened.
- The scope of the matter.
- Witnesses or documentation that can support the disclosure.

In order for FoodChain ID to deal with the disclosure in the best way possible, it is an advantage that the disclosure is made in writing, preferably with examples and documentation. It is also an advantage that it contains contact details so that the company can contact you if more information about the wrongdoing/concern is needed.

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within FoodChain ID and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

5. What FoodChain ID will do

FoodChain ID will respond to your concerns as quickly as possible, and always within reasonable time. Do not forget that testing your concerns is not the same as either accepting or rejecting them.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- form the subject of an independent inquiry

Within **3-5 working days** of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how the company proposes to deal with the matter
- supplying you with information on staff support mechanisms
- telling you whether further investigations will take place and if not, why not.

The amount of contact between you and those handling the notification of a wrongdoing will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you in support.

FoodChain ID will do what it can to minimize any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, FoodChain ID will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

6. How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within the company to raise concerns. FoodChain ID hopes you will be satisfied with any action taken. If you are not, and you feel it is right

to take the matter outside you may always notify the public authority. You may also notify the general public or the media if:

- a) you are in good faith about the content of the notice,
- b) the notice concerns matters of public interest, and
- c) you have first notified internally in FoodChain ID or you have reasons to believe that such internal notification will not be suitable.

This Policy **does not** prevent you from taking your own legal advice.

7. Monitoring

It is the employer who has the burden of proof in documenting how concerns raised are handled and subsequently documenting the actions taken to prevent similar occurrences.

Responsibility

HR is accountable for ensuring this Policy is compliant with local regulations within the countries FoodChain ID operates. HR will be responsible to review this Policy annually.

References

Version history

Version	Description of change	Date	Created/Revised by	Approved by
1	Created	12.2023	Etienne Kassnel, HR Director Europe & Asia	ELT