

# GLOBAL WHISTLEBLOWING POLICY RAISE A CONCERN – OPEN TALK DO THE RIGHT THING





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## 1. PURPOSE & SCOPE

We at ARYZTA AG are committed to conducting our business with honesty and integrity and in compliance with applicable laws and regulations. The Board of Directors and management therefore have a zero-tolerance policy towards illegal and unethical conduct in connection with our business. To detect, investigate and remediate violations, it is important that all reports are handled carefully and professionally. Whistleblowers can play an important role in this process. All workers are therefore encouraged to speak up and to report any possible or actual misconduct. All reports will be taken seriously, and suspicions of a violation will be investigated appropriately.

This policy applies to all current and former **workers**. The term workers includes employees, directors, officers, consultants, contractors, sub-contractors, suppliers, sub-suppliers, casual, voluntary, agency workers and similar third parties of **ARYZTA AG and its subsidiaries** (“the Group”).

This Group policy sets out our approach to **encourage workers to report any legal or ethical concerns and to protect and support those individuals who report such concerns without fear of retaliation**. The aim of this policy is to provide workers with clear and easily accessible information for raising any legal or unethical concerns related to the Group. This policy should be read in conjunction with our other Group Policies – the Code of Conduct for Employees and Code of Conduct for Suppliers. The implementation of this Group policy should also be in compliance with local applicable law.

The ARYZTA AG Audit Committee (which is a sub-committee of the Board) is responsible for overseeing management’s implementation of this policy and procedures. **The Group Report Steering Committee** has overall operational responsibility for this policy. The **Audit Committee** has established procedures to govern the handling and treatment of Open Talk cases.

## 2. OPEN TALK

If you have **knowledge of, or grounds to suspect wrongdoing of a legal or unethical nature related to the Group**, whether it is a breach of internal policies, legal or regulatory obligations, we encourage you to speak up.

You should feel comfortable about raising your concerns. This protects each of us, our business and our stakeholders. We must always **«Do the Right Thing»**.

Misconduct of a legal or unethical nature includes, but is not limited to:

- Financial malpractice, misrepresentations, impropriety, or fraud, including accounting and auditing or disclosure concerns;
- Failure to comply with a legal or regulatory obligation;
- Public health and food safety;
- Risk or damage to the environment;
- Criminal activity;
- Bribery, facilitation of tax evasion or money laundering;
- Privacy, confidentiality and data protection breaches;
- Anti-competitive conduct;
- Breaches of sanctions;
- Violations of human rights, such as modern slavery, child labour and human trafficking;
- Bullying, discrimination, (sexual) harassment, personal insults and similar,
- Wilful breach of any legal obligation such as failure to comply with applicable laws such as laws relating to environmental protection, food safety, health and safety, consumer protection, equality, competition, business secrets, insider trading regulations, stock exchange rules or anti-money laundering procedures etc.
- Attempts to cover up any of these behaviours.

Please be aware that concerns which are inter-personal grievances are excluded unless the behaviour is such that it impacts the health and safety of others within the workplace. Matters that are purely personal grievances about another worker and do not constitute misconduct as listed above should be raised directly with your local HR representative.

### 3. REPORTING PROCEDURE

#### Submitting Reports

There are several ways to submit a report which are explained below. When submitting a report, we encourage you to provide as much detail as possible concerning the suspected wrongdoing. This will allow us to conduct any investigation promptly and effectively. The report should explain who did what, when and at what time. If possible, additional information, documents or evidence should be provided.

There are several ways for you to speak up and submit a report:

- 1) You can report directly to the Group General Counsel in writing, or by email, call or in person. You can ask the Group General Counsel for a meeting in person or via video or telephone call to raise your concern.
- 2) You can use the external Open Talk Hotline to submit your report by email or call. The ARYZTA Open Talk Hotline is managed by NAVEX which is an independent service and is not part of the ARYZTA Group. The Open Talk ARYZTA Hotline can be contacted at [aryzta.ethicspoint.com](http://aryzta.ethicspoint.com) or via local, toll-free phone numbers that connect reporters to a multilingual reporting service. Countries listed below have a localized reporting channel via the Open Talk Hotline which is managed by NAVEX. Workers in those countries will be given the option to instruct the Open Talk Hotline specialist to:
  - (i) report to the Responsible Person in the **local business**; or
  - (ii) report to the Responsible Person at Group ARYZTA AG level.

Reports from workers in the other countries will be forwarded to the Responsible Person at Group ARYZTA AG level.

#### ARYZTA Open Talk Hotline Numbers

Australia 1800 586 773	New Zealand 0800 623 379
Bulgaria 0800 46 042	Poland 0 0 800 141 0026
Denmark 80 83 02 14	Romania 0800 360 156
France 0 805 08 05 97	Singapore 800 492 2341
Germany 0800 1810489	Spain 900 998 482
Hungary 80 088 170	Sweden 020 10 93 36
Ireland 1800 903 317	Switzerland 0800 836 702
Japan 0800-222-1167	Taiwan 00801 49 1210
Malaysia 1-800-81-7790	United Kingdom 0800 086 8783
Netherlands 0800 0232665	

The Hotline is available 24 hours, seven days a week every day of the year, by trained specialists from an independent third-party provider of corporate compliance services who will answer your call, document your report and forward it to the appropriate responsible person within the local Company or Group as appropriate for further investigation.

When you contact the Hotline, you may choose to remain anonymous. All reports will be treated equally whether they are submitted anonymously or not. All concerns about legal or ethical issues concerning the ARYZTA Group will be treated seriously and discreetly. They will be investigated and, where needed, corrective action will be taken.

### **Feedback**

When a worker raises a concern via email or the Hotline, receipt of the concern will be acknowledged within at least 7 days and feedback will be given not more than 3 months from the date of acknowledgement of receipt of the concern and at further intervals. Feedback is information on the action envisaged or taken as follow-up and on the reasons for such follow-up. No information will be provided that could prejudice the outcome of an investigation or any subsequent process or which could undermine the rights of due process and fair procedure against whom the allegations have been made.

### **Disclosures Externally**

Reports that relate to facts in member states of the European Union or that are also uncovered by whistleblowers within the European Union can also be submitted to external reporting bodies. An overview of the relevant competent authorities can be found on the ARYZTA website.

#### 4. NO RETALIATION

We aim to encourage openness and will support individuals who raise their reasonable concerns about legal or ethical issues even if they are subsequently proven to be mistaken.

Any form of retaliation or discrimination against a person who has raised a concern will not be tolerated and will be treated as a serious disciplinary matter. This also applies to any attempt at retaliation. If you see any retaliation or discrimination taking place, please report it immediately.

Only those who intentionally or knowingly reported false or misleading information are not protected from retaliation.

#### 5. CONFIDENTIALITY

We will treat all disclosures of suspected wrongdoing in a confidential and sensitive manner and maintain the worker's privacy unless they have explicitly consented to disclosure of your identity. If the reporter has explicitly consented to disclosure of your identity, this means that their identity will be shared only with those who have a **need to know** in order to effectively conduct any investigation and follow up action (including, if necessary, disciplinary action) on your concern, or where there is a legal requirement to share your identity.

We encourage workers to come forward when making reports as this will greatly assist in narrowing the investigation. If a worker chooses to make an anonymous report, the Group will respect the workers' decision.

Exceptions to confidentiality are limited, e.g. if disclosure to an authority or court is required by law or ordered by an authority. Other disclosures will be made either on an abstract basis or with the prior consent of the reporter, if this is required by law.



**Version control – for internal use**

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