

Whistleblowing Policy

1. Policy Overview & Purpose

Mondiale VGL is committed to fostering a culture of openness, integrity, and accountability. Each of us plays a vital role in creating an environment that supports our mission, embraces inclusivity, and enables everyone to thrive. Doing the right thing matters.

We encourage everyone who works with us, and those we do business with, to speak up when something doesn't seem right. Our [Code of Conduct](#) reflects our core values, sets clear expectations for all involved in our business, and provides the guidelines that shape our decisions, actions, and behaviours.

This policy supports our Code of Conduct by offering a clear process for raising concerns and detailing the protections in place when concerns about misconduct or wrongdoings are reported. Its aim is to encourage the reporting of actions that may be unlawful or could expose Mondiale VGL to financial loss, regulatory prosecution, or reputational harm, by outlining the procedure for disclosing improper conduct.

This policy applies globally and may be supplemented by additional requirements that apply to officers and employees in specific countries of operation. These additional requirements are set out in Annexures (and Schedules) to the Policy.

This policy may be amended from time to time.

2. Scope

This policy applies to all employees, directors or officers, and external third parties who provide, or have provided, goods or services to Mondiale VGL. The scope of employees refers to all employees, regardless of their position or level within the organisation. Third parties can refer to suppliers, contractors, customers or shareholders.

The scope of concerns covered by this policy includes the misconduct or wrongdoings described below along with those covered by any applicable legislation in the countries we operate in.

What misconduct or wrongdoing is covered by this policy?

For the purposes of this policy misconduct or wrongdoing includes any act, omission, or conduct that:

- Breaches our Code of Conduct;
- Involves unethical or unprofessional behaviour;
- Is an offence;
- Poses a serious risk to the environment, or the health and safety of employees or others, including bullying and harassment;
- Raises issues of honesty or integrity, such as fraud, theft, bribery, or corruption;
- Represents a conflict of interest, including matters related to external business interests, relationships, improper payments, and donations;
- Poses a serious risk to the maintenance of law, including the prevention, investigation and detection of offences, or the right to a fair trial;
- Breaches the privacy and confidentiality of any employee, supplier, customer, or Mondiale VGL;
- Is unlawful, or corrupt, or involves an irregular use of public funds or public resources; or
- Involves retaliation against any individual for reporting, or planning to report, in good faith, or includes threats of retaliatory behaviour.

What types of concerns are not covered by this policy?

While our people are encouraged to speak up when they see things that aren't right, not every type of concern is covered by this policy. Examples of concerns that are not covered by this policy are:

- Personal, work-related grievances (such as disputes between employees, decisions about people's employment or remuneration or decisions about people's behaviour or performance).
- Dissatisfaction with the leadership of Mondiale VGL or a specific country, department or team.
- Customer complaints (unless the complaint is regarding a breach of our Code of Conduct).

Generally, these types of concerns are not matters that the whistleblower policy or country whistleblower laws are intended to protect, unless they have broader implications for Mondiale VGL or they relate to misconduct or wrongdoings covered by this policy. We have other internal processes designed to deal with these types of matters, including talking to your manager or your Human Resources team.

3. Making a Report

There are several channels available if you have reasonable grounds to suspect potential misconduct or wrongdoing. You are encouraged to speak to your direct manager or supervisor in the first instance.

However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on our [website](#) and our [intranet](#).

You can access the Speak Up [website here](#): <http://www.mondialevglSpeakup.deloitte.com.au/> or the dedicated email address here mondialevglSpeakup@deloitte.com.au. There are freephone numbers available for some countries as well: 0800 003 931 (NZ), 1800 367 269 (AUS) or 1800 1322 0202 (Philippines).

The return post address for those wishing to report concerns in writing is:

Mondiale VGL Speak Up
Reply paid 12628
A'Beckett Street,
Melbourne VIC 8006
Australia

Mondiale VGL Speak Up
PO Box 912028
Victoria Street West
Auckland 1142
New Zealand

While we encourage concerns covered by this policy to be raised internally, we understand that in some countries where national law allows, people may also report concerns directly to external authorities.

Reporting suspected or actual misconduct or wrongdoing as early as possible can make it easier to take action. When making a report, providing as much information as possible, including the nature of the misconduct, parties involved, dates, locations, and any supporting information can help with the investigation.

False Reporting

Anyone making a report under this policy will not be subject to disciplinary action or be disadvantaged on the grounds of reporting potential misconduct or wrongdoing in good faith. However, if we conclude that a report has been made under false or malicious pretences, the whistleblower may be subject to disciplinary action and may not be protected under this policy. False reporting does not include instances where you make a report on grounds of reasonable suspicion, but this is revealed to be unfounded following an investigation.

4. Confidentiality and Anonymity

We know that speaking up can be difficult and we are committed to protecting anyone who chooses to make a report. Reports made under this policy can be made confidentially or anonymously if you do not want to disclose your identity.

When you make a report under this policy, the person to whom you make a report will only disclose your identity if you give your consent. Knowing your identity may assist us in investigating the serious wrongdoing you have reported, improve the effectiveness of the investigation, and enable us to update, support and protect you better.

The confidentiality of your identity will be protected through measures such as storing information about a report securely, redacting your identity from relevant documents and only sharing your identity with those who have a legitimate need to know, subject to your consent.

We may have to disclose your identity where:

- Mondiale VGL cannot effectively and fairly investigate the allegations without disclosing your identity;
- Maintaining confidentiality in your identity creates a serious risk to the health or safety of any person, or the environment; or
- For legal and regulatory reasons, where Mondiale VGL is required by law to disclose your identity to lawyers, regulators or law enforcement authorities, regardless of the level of consent you have provided (for example, if required by a court order).

If in the case where we cannot maintain confidentiality for the reasons stated above, we will advise you of this in advance.

You can make an anonymous report using the Speak Up service provided it is not prohibited by local rules and regulations. However, it can be difficult to investigate the matter fully or even at all depending on the circumstances.

If you wish to remain anonymous, we encourage you to remain in contact through the Speak Up service so you can answer any follow up questions, provide feedback and receive updates on any investigation.

If you raise a concern about misconduct or wrongdoing, you must keep the information you disclose confidential between yourself and the person you reported it to.

Statutory protections

There may be country specific protections for the disclosure of wrongdoings available in the countries we operate in. This policy does not provide legal advice as to the application of any country specific legislation and protections under the law for your specific circumstances. Common principles included in these country specific protections is that all employees and workers need:

- accessible and reliable channels to report perceived wrongdoing;
- robust protection from retaliation; and
- mechanisms that correct legislative, policy or procedural inadequacies, and prevent future wrongdoing.

If you require further information regarding the application of any laws in your specific country, we encourage you to seek independent legal advice.

Mondiale VGL may also obtain its own legal advice when investigating a matter in a country that has relevant legislation in place, to ensure it complies with those laws when handling concerns raised.

Wellbeing support

Additional support through our Employee Assistance Programme is available to Mondiale VGL employees who have made, or are considering making, a report under this policy. Our Employee Assistance Programme provides free, confidential, wellbeing support services by qualified professionals. Details of the programme can be found on our [Intranet here](#).

5. Protection and Support

Our priority at Mondiale VGL is to protect and support people who speak up and raise genuine concerns under this policy. We will not tolerate any behaviour that discourages someone from reporting potential misconduct or wrongdoing, or behaviour regarded as retaliation against a report that has been made.

Retaliatory treatment may include dismissal, demotion, discrimination, harassment, disciplinary action, threats, intimidation, causing harm, injury or damage to any person or their property, or other unfavourable treatment connected with making a report.

These protections apply regardless of whether any concern of potential misconduct or wrongdoing raised in a report are substantiated, provided the report has been made in good faith and on reasonable grounds. These protections also apply to individuals conducting, assisting or participating in an investigation.

If you experience any retaliatory treatment or behaviour, you should contact a member of your HR team or the Speak Up service immediately. Reports of retaliatory treatment or behaviour will be treated confidentially. Anyone engaging in retaliatory treatment or behaviour may be subject to disciplinary action.

6. Investigations

How are reports investigated?

When a report of misconduct or wrongdoing is made through internal channels or the Speak Up service, a designated member of the Executive Team will be notified and will be responsible for managing the investigation. Depending on the nature of the misconduct or wrongdoing reported or the individual involved, the matter may be escalated (e.g. including to the company's legal advisers, Finance Committee Chair or Board Chair, as appropriate).

Once a report is received, it will be assessed to determine if it should be managed under this policy (see Section 3 for more information), how it will be investigated, and whether any conflicts of interest are involved. The report must provide enough information to establish a reasonable basis for investigation.

Depending on the assessment, the investigation may be led internally e.g. by a member of the Human Resources team, or by an independent external investigator and will be conducted in a timely, fair and

impartial manner and in accordance with applicable laws. All investigators appointed to an investigation, whether internal or external, will be briefed on the concern reported, any aspects of confidentiality and anonymity as well as the confidentiality obligations.

The purpose of the investigation is to verify the reported concern and evidence provided, and potentially collect further information as required. This may involve speaking with the individual who reported the concern, others who may have relevant information, and, if necessary, the person about whom the concern was raised, to ensure a fair and thorough investigation process. Any investigation should be treated as confidential.

The investigator will determine the conclusions of the matter and provide recommendations to the designated member of the Executive team on its resolution based on the evidence gathered. The resolution will always be proportionate to the matter and based on the findings of the investigation.

In some cases, it may not be possible to conduct a full investigation, or any investigation at all. This could occur if you choose to remain anonymous, have not given consent to be contacted, decline to participate, or are unable to provide additional information. If this is the case, we will inform you accordingly.

Updates on investigated reports will be provided to the person who reported the concern through the Speak Up service. There may be circumstances where it is not appropriate to provide details of the outcome of the investigation to the person who made the report. Any investigation and its outcome will be reported internally as appropriate, including to the Chief Executive Officer and the Finance Committee, with any confidentiality requirements maintained.

If a report involves any member of the Executive team or the Board of Directors, the matter will be assigned to the Chair of the Finance Committee. A report involving the Chair of the Finance Committee will be assigned to the Chair of the Board. In both situations the concern reported will follow the same procedure as any other reported allegation of misconduct or wrongdoing.

Mondiale VGL will endeavour to complete the investigation within 20 working days. Where it is impracticable to complete the investigation within 20 working days, we will take all of the steps above and advise the individual who reported the concern how long we expect it to take to deal with the matter and will keep the individual updated about the progress of the matter.

To see an illustration of the investigation process please refer to Appendix 1.

Fair treatment for individuals

This policy is based on the fair treatment of all individuals involved in any reported concern and subsequent investigation. This includes handling reports and investigations with confidentiality and sensitivity. When appropriate, individuals against whom allegations of misconduct or wrongdoing are made will have an opportunity to respond before any adverse findings are included in the investigation report, and for employees, before any disciplinary action is considered.

Options if you are unhappy with the investigation

If you have reasonable grounds to be dissatisfied with the investigation of your concern or the actions taken in response, you may escalate the matter by requesting a review from the Group Chief Executive Officer or the Chair of the Finance Committee.

7. Responsibilities

The Board oversees the management of the Whistleblower Policy and will review and assess the policy at least annually.

The Chief People Officer is the owner of this policy and will recommend any changes to the Board for approval. The local management team, in conjunction with the HR Manager, are responsible for implementing the policy and procedures and ensuring employees are aware of this policy and Speak Up service.

All employees are responsible for complying with the standards set out in the Code of Conduct, company policies and procedures and local laws and regulations. Suppliers and other third parties are responsible for complying with the Supplier Code of Conduct.

This Whistleblower Policy will be available on Mondiale VGL's intranet and a printed copy will be available on request. All Mondiale VGL employees will be reminded of this Whistleblower Policy at least annually as part of their periodic policy refresher training.

8. Questions on this Policy

Please contact your manager or HR Manager if you need guidance or have any questions about this Policy. If you are not an employee, please contact the Chief People Officer.

Related Policies: Anti-Bribery and Corruption Policy, Bullying and Harassment Policy, Code of Conduct, Competition Law Compliance Policy, Human Rights Policy, Sanctions Policy, Supplier Code of Conduct.

9. Attachments

Appendix 1 – Investigation Process Summary

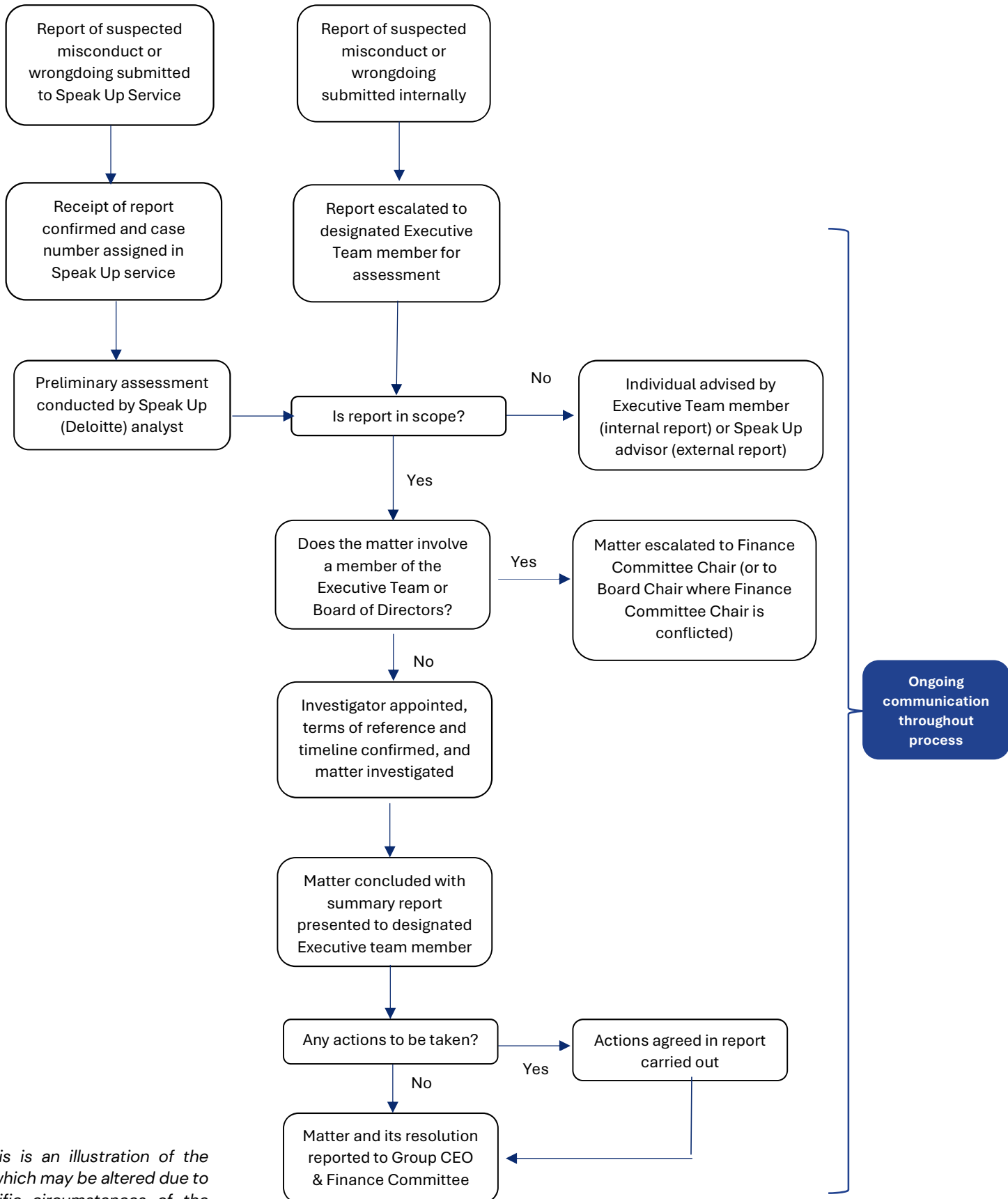
Annexure A – Australian Requirements

Annexure B – European Requirements

- Schedule 1: Belgium
- Schedule 2: Denmark
- Schedule 3: Germany
- Schedule 4: Italy
- Schedule 5: Netherlands
- Schedule 6: Spain

Annexure C – Asia and South East Asia Requirements

Appendix 1: Investigation Process



Note: this is an illustration of the process which may be altered due to the specific circumstances of the concern reported.

Annexure A To Whistleblowing Policy: Australia

What is the scope and purpose of this annexure?

1. This annexure to the Whistleblowing Policy (“Policy”) applies to officers and employees of Mondiale VGL in Australia.
2. In Australia, the *Corporations Act 2001* provides legal protection to “eligible whistleblowers” who have reasonable grounds to suspect certain wrongdoing and report “disclosable matters” to “eligible recipients”.

Who are eligible whistleblowers?

3. An eligible whistleblower includes an individual in Australia who is a current or former:
 - officer or employee (including permanent, part time, fixed term or temporary, managers and directors) of Mondiale VGL;
 - supplier of services or goods to Mondiale VGL (whether paid or unpaid) and their employees (including current and former contractors, consultants, service providers and business partners);
 - an associate of Mondiale VGL (including directors of Mondiale VGL and its related bodies corporate); and
 - a relative, dependant or spouse of any individual referred to above.

What are disclosable matters?

4. The wrongdoing referred to in paragraph 2 of the Policy includes circumstances where an eligible whistleblower has reasonable grounds to suspect that:
 - the information concerns misconduct, or an improper state of affairs or circumstances in relation to Mondiale VGL or a related body corporate; or
 - the information indicates that Mondiale VGL, a related body corporate, or any officer or employee of Mondiale VGL or a related body corporate, has engaged in conduct that:
 - constitutes an offence against, or a contravention of, a provision of any of the following (as amended from time to time):
 - *Corporations Act 2001*;
 - *Australian Securities and Investments Commission Act 2001*;
 - *Banking Act 1959*;
 - *Financial Sector (Collection of Data) Act 2001*;

- *Insurance Act 1973*;
 - *Life Insurance Act 1995*;
 - *National Consumer Credit Protection Act 2009*;
 - *Superannuation Industry (Supervision) Act 1993*; or
 - an instrument made under an Act referred to above.
- constitutes an offence against any other law of the Commonwealth that is punishable by a period of 12 months or more; or
 - represents a danger to the public or the financial system.
5. The wrongdoing referred to in paragraph 2 of the Policy does not include a personal work-related grievance (i.e. a grievance about the discloser's employment, or former employment, having or tending to have, implications for the disclosure personally) *unless* that grievance has significant implications for Mondiale VGL *and* meets the requirements of paragraph 4 of this Annexure.
6. If you have a personal work-related grievance, please contact a member of the HR Team.

Who are eligible recipients?

7. An eligible whistleblower can report disclosable matters to an officer or senior manager of Mondiale VGL.
8. While Mondiale VGL encourages matters to be disclosed internally, an eligible whistleblower may also report disclosable matters:
- using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) and [our intranet](#) and at paragraph 3 of the Policy.
 - To an auditor, or a member of an audit team, conducting an audit of Mondiale VGL or a related body corporate;
 - To an actuary of Mondiale VGL or a related body corporate;
 - To a legal practitioner for the purpose of obtaining legal advice or legal representation regarding the whistleblower provisions under the *Corporations Act*; or
 - To the Australian Securities and Investment Commission (ASIC), the Australian Prudential Regulation Authority (APRA) or any other Commonwealth body prescribed by the regulations.
9. In certain circumstances, an emergency and public interest disclosure may also be reported to journalists and members of the Commonwealth, State or Territory parliaments. You should contact Mondiale VGL's Chief People Officer or an independent legal advisor to ensure you understand the criteria for making an emergency or public interest disclosure.

What protections are available?

10. If you are an eligible whistleblower who reports a disclosable matter (or an emergency disclosure or public interest disclosure) to an eligible recipient under the Policy:
 - you will not be subject to any civil, criminal or administrative liability (including disciplinary action) for making the disclosure;
 - no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against you for making the disclosure;
 - in certain circumstances, the information is not admissible in evidence against you in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings relating to the falsity of the information; and
 - you will be protected from detrimental conduct or the threat (whether express or implied, conditional or unconditional) of detrimental conduct in relation to a disclosure.

Note, however, that the protections under the *Corporations Act* do not grant immunity for any misconduct you have engaged in that is revealed in the disclosure or is subsequently discovered.

Protecting your identity

11. We are legally obliged to protect the confidentiality of your identity as an eligible whistleblower. Subject to limited exceptions, it is illegal for a person to identify an eligible whistleblower or disclose information that is likely to lead to the identification of the eligible whistleblower.
12. You are entitled to remain anonymous or reveal your identity during or after the investigation. You can use an anonymous email address or pseudonym. You can choose to not answer any follow-up questions if you feel that doing so could reveal your identity, although anonymity may limit our ability to investigate and address the matter.

Protecting records

13. We take reasonable steps to protect the confidentiality of an eligible whistleblower's identity, including storing information in a secure location, redacting the whistleblower's identity from relevant documents and not sharing information without the whistleblower's consent unless it is reasonably necessary to manage and investigate the matter.

Protecting you from detrimental conduct

14. Examples of detrimental conduct include dismissal, changes to employment or terms of employment, harassment or intimidation and damage to property or reputation. Threats of detrimental conduct may be express or implied, conditional or unconditional.
15. If detriment has occurred, we will, on a case-by-case basis, consult with you to determine what actions are appropriate, for example we could re-assign or relocate other staff involved in the disclosable matter, allow you to take extended leave or develop an alternate career development plan. We may also take disciplinary action against the offender(s).

16. You can also seek independent legal advice if you feel you have suffered detrimental conduct that is prohibited by law. Courts have broad scope to make orders to remedy a detriment or threatened detriment, including injunctions, reinstatement, damages and the making of apologies.

How is a disclosable matter investigated and handled?

17. If an eligible whistleblower reports a disclosable matter to an eligible recipient, we will conduct an initial assessment to determine if it qualifies for protection under the Policy and if a formal, in-depth investigation is required.
18. Investigations will typically be conducted by an investigator independent of the department involved, and allow any person(s) against whom allegations are made to be given an opportunity to respond. In some cases, an external investigator may be engaged (for example, if there is a conflict of interest or because of the seniority of the person(s) involved).
19. The process, documentation, reporting and timeframe for an investigation will vary depending on the circumstances.
20. If you are contactable, we will provide you with updates, although the frequency and nature of the updates will depend on the issues being investigated.
21. Refer also to paragraph 6 of the Policy for more information as to the way investigations will be managed.

Where is this Annexure available?

22. The Policy and this Annexure is available to Mondiale VGL officers and employees via the Mondiale VGL intranet, learning management system and is posted on the Company's website.

Annexure B To Whistleblowing Policy: Europe

What is the scope and purpose of this annexure?

1. This annexure to the Whistleblowing Policy ("Policy") applies to officers and employees of Mondiale VGL in the European region. Refer to the attached Schedules for country-specific EU Member State requirements.
2. The measures relating to protection also apply to those who could suffer retaliation in a work-related context, e.g. those who assist a person in the reporting process, third parties connected to the person reporting or legal entities owned by the person reporting.
3. This annexure does not form part of any employee's contract of employment and may be amended from time to time.

Who are eligible reporting persons?

1. An eligible reporting persons includes an individual in the European region who is a current or former:
 - officer or employee (including permanent, part time, fixed term, temporary, casual or intern, managers and directors) of Mondiale VGL;
 - supplier of services or goods to Mondiale VGL (whether paid or unpaid) and their employees (including current and former contractors, consultants, service providers and business partners);
 - an associate of Mondiale VGL (including directors of Mondiale VGL and its related bodies corporate);
 - consultant, contractor and any sub-contractor working with Mondiale VGL;
 - facilitators assisting a reporting person; and
 - a relative, dependant or spouse of any individual referred to above who could suffer retaliation.

What are disclosable matters?

1. The wrongdoing referred to in paragraph 2of the Policy includes the disclosure of information related to a genuine concern about suspected or anticipated wrongdoing in the workplace. The specific concept of whistleblowing can be defined differently by countries within the European region. Please refer to the schedules below for country specific advice as covered by this Policy.
2. If you are based in one country, but the alleged wrongdoing you wish to report occurred in another country, you should refer to the schedule relating to the country in which you are based. If there is not a schedule for the country in which you are based, you should raise any concerns about suspected wrongdoing using the reporting channels contained in paragraph 3.

3. The wrongdoing referred to in paragraph 2 of the Policy does not include a personal work-related grievance (i.e. a grievance about the discloser's employment, or former employment, having or tending to have, implications for the disclosure personally) *unless* that grievance has significant implications for Mondiale VGL *and* meets the requirements of paragraph 4 of this Annexure.
4. If you have a personal work-related grievance, please contact a member of the HR Team.

How is a disclosable matter investigated and handled?

1. Once an eligible whistleblower reports a disclosable matter they will be notified of receipt within 7 days and an initial assessment will be conducted to determine if it qualifies for protection under the Policy and if a formal, in-depth investigation is required in accordance with the procedures and timing set out in Article 9 of the EU Whistleblowing Directive¹ and the regulations of the relevant Member State
2. If the assessment concludes that the matter does not constitute reportable conduct, the information will be immediately deleted or otherwise stored, having been anonymised.
3. Investigations will typically be conducted by an investigator independent of the department involved, and allow any person(s) against whom allegations are made to be given an opportunity to respond. In some cases, an external investigator may be engaged (for example, if there is a conflict of interest or because of the seniority of the person(s) involved).
4. The process, documentation, reporting and timeframe for an investigation will vary depending on the circumstances.
5. If you are contactable, we will provide you with updates, although the frequency and nature of the updates will depend on the issues being investigated.
6. Refer also to paragraph 6 of the Policy for more information as to the way investigations will be managed.

What protections are available?

1. Mondiale VGL is committed to ensuring anyone reporting a matter in good faith will not suffer any detrimental treatment as a result of raising a concern either internally or externally, as per paragraph 5 of the Policy. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern about alleged wrongdoing.
2. You must not threaten or retaliate against staff who have raised a concern about alleged wrongdoing. If you are found to be involved in such conduct, you may be subject to disciplinary action.
3. If you report a matter of wrongdoing it is preferable that you identify yourself, however under paragraph 4 of this [Policy/Annexure] we will make every effort to keep your identity confidential. If it's necessary for anyone other than the designated Executive team member or investigator as

¹ DIRECTIVE (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019 on the protection of persons who report breaches of Union law (as amended) ("EU Whistleblowing Directive").

noted in paragraph 6 to know your identity or to have access to information that can infer your identity, then subject to local law, you will be informed of this or seek your consent to make such a disclosure. Your identity may have to be disclosed in the context of a national authority investigation or judicial proceedings and you will be informed of this in advance unless this would prejudice the investigation or judicial proceedings.

4. Under paragraph 4 a report can be raised anonymously, however this may make it difficult for us to investigate the matter.
5. At times it may be considered necessary to share information with other countries, for example where the reported concern is about employees based outside of the Europe region. An assessment of concern will be carried out by the designated Executive team member or investigator to determine if there is a need to share information outside of Europe region, and if so the information will be shared on a confidential and secure basis. If there a need to disclose the identity of the individual raising the concern or information from which their identity can be inferred, then subject to local legal requirements the individual shall either be informed of this. or their consent shall be sought io make such disclosure.
6. The Group CEO or Chair of the Finance Committee may need to be notified of a reported wrongdoing where considered necessary due to the nature, scale and seriousness of the matter raised.
7. Mondiale VGL will comply with any applicable laws on the protection of personal data in the handling of any concern about potential wrongdoing. Personal data which is not relevant for the processing of a reported concern shall not be collected or if collected accidentally will be deleted without undue delay.
8. At any time, you can exercise any applicable rights granted under GDPR and any equivalent local legislation.

Where is this Annexure available?

1. The Policy and this Annexure is available to Mondiale VGL officers and employees via the Mondiale VGL intranet, learning management system and is posted on the Company's website.

Attachments – EU Member State Schedules

Refer to the attached EU Member State Schedules for country-specific requirements.

EU Member State Schedule 1: Belgium

What is whistleblowing?

Whistleblowing is the disclosure of information relating to a genuine concern about breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to financial services, products and markets and the prevention of money laundering and terrorist financing, environmental protection, public health, consumer protection, protection of privacy and personal data, and the security of networks and information systems.

In addition, other serious breaches about malpractice, wrongdoing or dangers in the workplace, including by way of example, criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; bribery; financial fraud or mismanagement; slavery, servitude or compulsory labour and human trafficking within the company or supply chains; breaches of any company policy or procedure or conduct likely to damage the company's reputation or financial wellbeing; serious or repeated violations of internal guidelines; serious harassment; or the deliberate concealment of any of the above. can also be reported under this Schedule.

If you have reasonable grounds to suspect any of the above then you can report it under this Schedule provided that:

- you have personal knowledge of the facts;
- you are not making a disclosure for personal gain or to cause harm; and
- the report is made in good faith.

How to report a concern

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

Data privacy

If no disciplinary or legal proceedings are initiated following the conclusion of any investigation into a concern about alleged wrongdoing, all personal data relating to the concern shall be deleted and at the latest within two months of the conclusion of the investigation unless there is a legal obligation to retain this data. If disciplinary or legal proceedings are initiated the personal data shall be retained until the conclusion of these proceedings and the expiry of any relevant appeal period in accordance with legal and regulatory requirements.

Individuals who are the subject of a concern of potential wrongdoing will be informed of this when personal data concerning the person is processed subject to any relevant legal and regulatory requirements which may prevent this. If providing such information would risk the destruction of evidence or lead to the disclosure of the identity of the person who reported the concern, the information provided may be delayed or limited.

The information provided will include the identity of the person in charge of the investigation, the facts which have been reported as appropriate, the recipients of the reported concern, and information concerning the individuals rights as regards to the personal data concerning them. This right does not include the right to know the identity of the person reporting the concern.

External disclosures

While we encourage the reporting of concerns using internal channels, it may be appropriate for reports to be made to an external body. The Federal Ombudsman will act as the Federal Coordinator for any external reporting: <https://www.federaalombudsman.be/en>.

EU Member State Schedule 2: Denmark

What is whistleblowing?

Whistleblowing is the disclosure of information relating to a genuine concern about breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to financial services, products and markets and the prevention of money laundering and terrorist financing, environmental protection, public health, consumer protection, protection of privacy and personal data, and the security of networks and information systems.

In addition, other serious breaches about malpractice, wrongdoing or dangers in the workplace, including by way of example: criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; bribery; financial fraud or mismanagement; slavery, servitude or compulsory labour and human trafficking within the company or supply chains; breaches of any company policy or procedure or conduct likely to damage the company's reputation or financial wellbeing; serious or repeated violations of internal guidelines; serious harassment, or the deliberate concealment of any of the above can also be reported under this Schedule.

If you have reasonable grounds to suspect any of the above then you can report it under this Schedule.

How to report a concern

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

Data privacy

If no disciplinary or legal proceedings are initiated following the conclusion of any investigation into a concern about alleged wrongdoing, all personal data relating to the concern shall be deleted and at the latest within two months of the conclusion of the investigation unless there is a legal obligation to retain this data. If disciplinary or legal proceedings are initiated the personal data shall be retained as appropriate.

Individuals who are the subject of a concern of potential wrongdoing will be informed of this once any investigation has concluded. You will be informed that personal data has been processed about you as part of a concern raised under this policy, what this related to and your connection with the matter. You will also be informed about the scope of the investigation and advised on your rights regarding the personal data relating to you. As per paragraph 6 of this Policy, you may be informed of the matter as part of the investigation.

External disclosures

While we encourage the reporting of concerns using internal channels, it may be appropriate for reports to be made to an external body. You can report a concern either in writing or orally to the Danish Data Protection Agency's external whistleblowing system: <https://whistleblower.dk/>.

EU Member State Schedule 3: Germany

What is whistleblowing?

Whistleblowing is the disclosure of information relating to a genuine concern about criminal offences, administrative offences threatening the life, limb or health of a person or the rights of employees or their representative bodies, or breaches of German law and EU law falling within the scope of the EU Whistleblowing Directive relating to areas including, but not limited to, financial services, products and markets and the prevention of money laundering and terrorist financing, environmental protection, public health, consumer protection, protection of privacy and personal data, and the security of networks and information systems.

If you have reasonable grounds to suspect any of the above then you can report it under this Schedule.

How to report a concern

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

Data privacy

All documents related to your concern about alleged wrongdoing shall be kept for as long as necessary and no longer than three years from the date the final outcome is communicated. However, documents may be kept longer in order to meet any legal requirements as long as is necessary and proportionate.

Individuals who are the subject of a concern of potential wrongdoing will be informed of this when personal data concerning the person is processed subject to any relevant legal and regulatory requirements which may prevent this. If providing such information would risk the destruction of evidence or otherwise damage the assertion, exercise or defence of civil law claims, or lead to the disclosure of the identity of the person who reported the concern, the information provided may be delayed or limited. The information provided will include the identity of the person in charge of the investigation, the facts which have been reported as appropriate, the purposes for which the data will be processed, the recipients of the reported concern, and information concerning the individuals rights as regards to the personal data concerning them. This right does not include the right to know the identity of the person reporting the concern.

External disclosures

While we encourage the reporting of concerns using internal channels, it may be appropriate for reports to be made to an external body. You can report a concern externally with the external reporting offices of:

- the Federal Office of Justice
- the Federal Financial Supervisory Authority (BaFin) for breaches that fall under the supervision of BaFin as a financial regulator; or
- the Federal Cartel Office for breaches of European Union or national competition law.

Further information can be found on the website for the Federal Office of Justice: https://www.bundesjustizamt.de/EN/Home/Home_node.html.

EU Member State Schedule 4: Italy

What is whistleblowing?

Whistleblowing is the disclosure of information relating to a genuine concern about breaches of EU or Italian law which can harm the public interest or integrity of the Europe region.

Breaches that can be reported include:

- administrative, accounting, civil or criminal offences;
- unlawful conduct under Legislative Decree No. 231/2001 or violations of organisational models required under this law (Model 231);
- offences falling within the scope of EU or Italian law;
- acts or omissions affecting the financial interests of the EU (i.e. relating to fraud);
- acts or omissions affecting the internal market (the free movement of goods, Persons, services and capital) including violations of EU competition law, state aid rules and laws relating to corporate taxation;
- acts or conduct that frustrate the object or purpose of EU law relating to the matters referenced in c), d) or e) above.

The following instances should not be reported under this Policy and Schedule:

- objections, claims, or requests linked to your personal interest
- reports of breaches where there are already mandatory reporting channels regulated by EU or national acts: or
- reports of breaches relating to national security or procurement relating to defence or national security unless covered by relevant secondary EU law.

You can refer here for more information on the Model 231: <https://www.anticorruzione.it/-/whistleblowing>

If you have reasonable grounds to suspect any of the above then you can report it under this Schedule.

How to report a concern

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

The terms of this Schedule will apply irrespective of whether you raise your concern internally or through the Speak Up service. In the event that you raise a concern orally through the Speak Up service or internal channels, you will be asked to approve your statement.

Data privacy

We will seek your consent to disclose your identity or the relevant information as part of proceedings if disciplinary proceedings are initiated on the basis of your report on alleged wrongdoing and we consider that knowledge of your identity (or information from which your identity may be inferred) would be material for any defence. We will discuss the reasons why we think it is necessary to disclose your identity

with you.

All documents related to your report will be kept for as long as necessary, and in any event no longer than 5 years from the date the final outcome is communicated.

External disclosures

While we encourage the reporting of concerns using internal channels, it may be appropriate for reports to be made to an external body if:

- the reporting channels provided in this Schedule do not comply with Italian law;
- you have raised a concern under this Schedule and it has not been addressed in accordance with the section on investigation noted above;
- you have reasonable grounds to believe that your concern would not be investigated or you have reasonable grounds to believe that you would suffer retaliation; or
- you have reasonable grounds to believe that there is an imminent or obvious danger to the public.

You can make an external disclosure through the National Anti-Corruption Authority (ANAC)'s external reporting channel: <https://www.anticorruzione.it/-/whistleblowing>.

EU Member State Schedule 5: Netherlands

What is whistleblowing?

Whistleblowing is the disclosure of information relating to a genuine concern about a suspected act or omission whereby the public interest is at stake in the violation of a statutory provision, a danger to the safety of persons, a danger to the deterioration of the environment, a danger to the proper functioning of the public service or an enterprise as a result of an improper act or omission, not being a breach of Union law; or

Breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to financial services, products and markets and the prevention of money laundering and terrorist financing, environmental protection, public health, consumer protection, protection of privacy and personal data, and the security of networks and information systems.

If you have reasonable grounds to suspect any of the above then you can report it under this Schedule.

How to report a concern

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

Data privacy

If following conclusion of an investigation, the reported matter is not followed by disciplinary action or legal proceedings then data relating to the reported matter shall be destroyed or stored after having been anonymised within two months of the conclusion of the investigation unless there is a legal reason to retain the information. If disciplinary or legal proceedings are threatened or initiated then data relating to the matter shall be kept in accordance with legal and regulatory requirements.

External disclosures

While we encourage the reporting of concerns using internal channels, it may be appropriate for reports to be made to an external body such as:

- The investigation department of the Dutch Whistleblowers Authority ('Huis voor Klokkeluiders');
- The Netherlands Authority for Consumers & Markets ('Autoriteit Consument & Markt' ('ACM'));
- The Dutch Authority for Financial Markets (Autoriteit Financiële Markten' ('AFM'));
- The Dutch Data Protection Authority ('Autoriteit Persoonsgegevens' ('AP'));
- De Nederlandsche Bank ('DNB');
- Dutch Healthcare Authority ('Nedertandse Zorgautoriteit' ('NZa));
- Health and Youth Care Inspectorate ('Inspectie Gezondheidszorg en Jeugd' ('IGJ'));
- Authority for Nuclear Safety and Radiation Protection (Autoriteit Nucleaire Veiligheid en Stralingsbescherming' ('ANVS')).

EU Member State Schedule 6: Spain

What is whistleblowing?

Whistleblowing is the disclosure of information relating to a genuine concern about:

- acts or omissions which constitute an infringement of EU law, provided that breaches of EU law: (i) fall within the scope of the EU Whistleblowing Directive relating to areas including but not limited to financial services, products and markets and the prevention of money laundering and terrorist financing, environmental protection, public health, consumer protection, protection of privacy and personal data, and the security of networks and information systems; or (ii) affect the financial interests of the EU (i.e. relating to fraud); or (iii) have an impact on the internal market (the free movement of goods, persons, services and capital);
- Acts or omissions that may constitute a serious or very serious criminal or administrative offence in Spain;
- Breaches of labour law in the field of health and safety at work and breaches of legal obligations which are in the public interest; and
- Breaches of the Protocol for the Prevention of Sexual Harassment and Gender Based Harassment at work.

The following categories of information are excluded from the scope of Spanish whistleblowing law: classified information; information essential to the security of the State; and information protected by legal professional, medical or judicial secrecy.

If you have a genuine concern relating to any of the above or any suspected serious impropriety in the workplace involving managers, key personnel or employees in a leadership position then you should report it under this Policy and Schedule.

How to report a concern

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact your HR Manager or a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

Data privacy

Data will be retained only for as long as necessary to investigate the facts of a concern about alleged wrongdoing unless there is a legal obligation to retain the data. If it is established that some or all of the information provided is untrue then this information will be deleted immediately as soon as this becomes known, unless the failure to provide truthful information could constitute a criminal offence, in which case the information will be kept until the conclusion of any legal proceedings. If no investigation has been initiated within three months of receiving a concern the data will be deleted and only recorded in anonymised form.

Individuals who are the subject of a concern of potential wrongdoing will be informed of this when personal data concerning the person is processed subject to any relevant legal and regulatory requirements which may prevent this.

If providing such information would risk the destruction of evidence or lead to the disclosure of the identity of the person who reported the concern, the information provided may be delayed or limited. The information provided will include the information reported as appropriate and information concerning the individuals rights as regards to the personal data concerning them. This right does not include the right to know the identity of the person reporting the concern. Individuals will be provided with the right to be heard throughout any investigation.

If it is established after investigation that the information may constitute a criminal offence, the matter will be reported to the Public Prosecutor's Office or to the European Public Prosecutor's Office if the facts affect the financial interests of the European Union.

External disclosures

While we encourage the reporting of concerns using internal channels, it may be appropriate for reports to be made to an external body. You can make an external report to the Spanish Independent Authority for the Protection of Whistleblowers or any corresponding regional authority.

Annexure C To Whistleblowing Policy: Asia & Southeast Asia

How can matters be reported?

You are encouraged to speak to your direct manager or supervisor in the first instance. However, if you do not feel comfortable doing so you can contact a member of the Group Executive Team including the Group CEO or Chief People Officer.

You can also raise concerns using the Speak Up service by using the dedicated freephone number, website, email or return post. Speak Up is an independent service provided by Deloitte. There is further information on Speak Up on [our website](#) or and [our intranet](#).

What protections are available?

Protection for individuals reporting alleged wrongdoing may be afforded under the following legislation, as well as under this policy.

Country	Legislation
Hong Kong	Employment/Anti-Discrimination Ordinance Common Law
Malaysia	Whistleblower Protection Act
Singapore	Prevention of Corruption Act
Thailand	Labour Relations Act
Vietnam	Decree No 24/2018/ND-CP

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