

Speak Up Policy

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Summary Policy Statement

The Glanbia plc group ("Glanbia") is a global business operating in diverse cultures and business environments. We are committed to conducting business with respect for the law and for our values. We promote an open and transparent culture with the highest ethical standards of honesty, integrity and accountability.

We understand that it is not always easy to raise concerns about misconduct, but we encourage all 'workers' of Glanbia (refer to Section 2) to "Speak-Up" and report any situation where they have a reasonable belief that there has been a breach or potential breach of our policies, our Code of Conduct or the law which could amount to wrongdoing, illegal practices and/or unethical behaviour.

Any employee or other worker who decides to Speak-Up will be protected and, insofar as possible, any concerns raised will be dealt with confidentially, sensitively and appropriately as outlined in this policy.

Specifically a concern or disclosure should relate to suspected misconduct or wrong-doing at work such as (also refer to Section 4):

- Breach of our Code of Conduct;
- Commission of a criminal offence (including bribery and corruption, fraud or misuse of Glanbia property, resources or monies);
- Failure to comply with a legal obligation including violation of competition laws and rules;
- Insider trading;
- Questionable accounting practices and/ or non-compliance with Glanbia reporting policies or with IFRS;
- Conflicts of interest;
- Environmental, health and safety issues;
- Information security breaches; and
- Other unethical conduct including harassment, bullying or discrimination.

The location of the relevant wrong-doing is immaterial and should not discourage you from speaking up (refer to Section 7).

Where serious non-compliance with our Code is reported or otherwise suspected, steps will be taken to investigate and, if appropriate, remedy the situation, including disciplinary action (refer to Sections 10 & 11).

It is important to note that the Speak-Up Policy does not cover general work-related grievances. Any grievances you have in relation to your terms of employment or personal circumstances in the workplace such as overtime, promotions etc. should be referred to your local HR manager.

We encourage all 'workers' to read this policy carefully, should you have any questions regarding this policy please refer to one of the personnel outlined within Section 7 with your question.

Overall Policy Statement – Our Commitment:

Glanbia is a global business operating in diverse cultures and business environments. We are committed to conducting business with respect for the law and for our values. We promote an open and transparent culture with the highest ethical standards of honesty, integrity and accountability.

We understand that it is not always easy to raise concerns about misconduct, but we encourage our employees and other workers to “Speak-Up” and report any situation where they have a reasonable belief that there has been a breach or potential breach of our policies, our Code of Conduct or the law which could amount to wrongdoing, illegal practices and/or unethical behaviour. Any employee or other worker who decides to Speak-Up will be protected and, insofar as possible, any concerns raised will be dealt with confidentially, sensitively and appropriately as outlined in this policy.

1. Purpose

Whistleblowing occurs when a worker raises a concern or discloses information relating to wrongdoing, illegal practices and/or unethical conduct, which has come to their attention through work or in a work-related context.

We really value the help of workers who identify genuine concerns about any matters relating to actual or potential wrongdoing. Speaking up is essential for us to sustain our reputation, success and ability to operate both now and in the future. If an issue is raised internally first, and acted upon, it is likely to reduce any damage that may otherwise occur. Reporting of issues may also detect and possibly deter any further wrongdoing.

The aims of this policy are:

1. to encourage the reporting of suspected wrongdoing as soon as possible in the knowledge that reports will be taken seriously and investigated as appropriate;
2. to provide guidance as to how to raise those concerns and how those concerns will be dealt with in a clear, formal and safe manner; and
3. to reassure you that genuine concerns can and should be raised, even if they turn out to be mistaken, without fear of penalisation.

Glanbia will not tolerate harassment or any retaliation against anyone who seeks guidance, raises a genuine concern or reports a breach or suspected breach.

2. Scope

This policy applies to all ‘workers’ of Glanbia including any employee, director or officer of any wholly owned subsidiaries or in any joint venture or associate operations of Glanbia, as well as to any other workers which includes independent contractors, consultants, trainees, agency staff, persons on work experience, shareholders, volunteers, prospective employees involved in the recruitment process or contract negotiations, and ex-employees. All workers are required to act consistently with this policy when working for Glanbia companies whether on our behalf or in our name, on any business activity including when delivering outsourced services.

Breach of this policy may result in disciplinary action, up to and including dismissal. Contracted personnel who fail to comply with this policy may have their contract terminated or not renewed, or be subject to other appropriate action.

3. Status of Policy

Workers should note that this policy does not form part of any contract of employment, and may be amended by Glanbia from time to time.

4. Types of Issues Covered

This policy covers the disclosure of information, which in the reasonable belief of the individual making the disclosure, tends to show one or more of the following wrongdoings has been, is being or is likely to be committed:

- Breach of the Code of Conduct;
- The committing of a criminal offence (including bribery and corruption, fraud or misuse of Glanbia property, resources or monies);
- Failure to comply with a legal obligation including violation of competition/anti-trust laws and rules;
- A miscarriage of justice;
- Insider trading;
- Questionable accounting practices e.g., non-compliance with Glanbia's reporting policies or with IFRS;
- Conflicts of interest;
- Environment, health and safety issues (e.g., breach or danger under the Health & Safety Rules including risks to the public as well as to other employees, damage to the environment);
- Information security breach e.g., improper disclosure of confidential information or failure / delay in reporting a missing laptop or other device storing company information;
- Other unethical conduct;
- unlawful or improper use of funds or resources of a public body;
- an act or omission by or on behalf of a public body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement; and

- an act or omission that is unlawful or that defeats the object or purpose of applicable rules, or the deliberate concealing or destruction of information, relating to the following areas:
 1. public procurement;
 2. financial services, products and markets, and the prevention of money laundering and terrorist financing;
 3. product safety and compliance;
 4. transport safety;
 5. protection of the environment;
 6. radiation protection and nuclear safety;
 7. food and feed safety and animal health and welfare;
 8. public health;
 9. consumer protection; or
 10. protection of privacy and personal data, and security of network and information systems.

This list is not exhaustive.

The location of the relevant wrongdoing is immaterial and should not discourage you from Speaking Up.

5. What is Not in Scope

You should feel free to raise concerns in any area, however certain disclosures may be more appropriately addressed in accordance with Glanbia's other policies or procedures e.g., issues in relation to your terms of employment, overtime, promotions, etc. may be referred back to your local HR Manager, and work-related grievances may be reviewed in accordance with the Grievance Procedure or Dignity at Work Policy.

This policy does not include wrongdoing which it is your function or Glanbia's function to detect, investigate or prosecute and which does not involve an act or omission on the part of Glanbia.



6. Penalisation

Any employee or other worker who raises a concern will not be penalised for doing so by Glanbia, and Glanbia strictly prohibits retaliation by any employee or other worker. Penalisation means any direct or indirect act or omission which occurs in a work-related context, is prompted by the making of a report and causes or may cause unjustified detriment to a worker.

The following actions may be considered as acts of penalisation or retaliation:

- Withholding of training;
- Suspension, lay-off or dismissal;
- Imposition or administering of any discipline, reprimand or other penalty (including a financial penalty);
- Discrimination, disadvantage or unfair treatment;
- Injury, damage or loss;
- Threat of reprisal;
- Demotion, loss of opportunity for promotion or withholding of promotion;
- Ostracism, coercion, intimidation or harassment;
- Transfer of duties, change of location of place of work, reduction in wages or change in working hours;
- A negative performance assessment or employment reference;
- Failure to convert a temporary employment contract into a permanent one, where the worker had a legitimate expectation that he or she would be offered permanent employment;
- Failure to renew or early termination of a temporary employment contract,
- Harm, including to the worker's reputation, particularly in social media, or financial loss, including loss of business and loss of income;

- Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- Early termination or cancellation of a contract for goods or services;
- Cancellation of a licence or permit; and
- Unilateral Psychiatric or medical referrals.

This list is not exhaustive.

Any employee or other worker who subjects a colleague to such treatment will face serious consequences such as disciplinary action, up to and including dismissal.

7. Confidentiality

Any employees or other workers who Speak-Up will be treated in a confidential and sensitive manner. Insofar as is possible, Glanbia will ensure that the identities of any persons who Speak-Up are protected. The focus will be on the wrongdoing rather than the person making the disclosure. However, situations may arise where confidentiality cannot be maintained, such as when required by law or where it is deemed necessary to provide a statement in an investigation. Should this be the case we will make every effort to inform the individual making the disclosure at the earliest opportunity.

8. False Allegations

Workers are not expected to prove the truth of an allegation. However, they must have a reasonable belief that there are grounds for their concern and must not use the policy to make allegations which they know to be false or to settle personal disputes. It should be noted that appropriate disciplinary action, up to and including dismissal, may be taken against any person who is found to knowingly have made false allegations or act with malicious intent.

9. Raising a Concern

The Group Secretary has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns arising under this policy. Any person raising a concern must exercise discretion and commit to keeping the reporting and investigation process confidential.

While disclosures can be made orally, workers are encouraged to make disclosures in writing or via the independent Speak-Up Line referenced below. The worker will need to be able to demonstrate and support the reasons for their concerns and provide evidence of their concerns where such evidence is available. Any reports setting out an individual's concerns should be factual (to the best of their knowledge) and should address the following key points to the extent that such information is known to the individual in relation to a wrongdoing that has occurred, is occurring or is likely to occur:

- what has occurred;
- when and where it occurred;
- who was involved;
- has Glanbia been put at risk or suffered loss as a result;
- has it happened before;
- has it been raised with anyone else either within Glanbia or externally and, if so, when/with whom;
- are there any other witnesses;
- is there any supporting information or documentation; and
- how the matter came to light.

There are a number of avenues to raise a concern; these include contacting one of the following:

- Line Manager; or
- Senior Local Management; or
- Senior Group Management; or
- The Independent Speak-Up Reporting Service (Safe Call): This facility allows you the option to raise a concern anonymously or to provide your name with the disclosure. In reporting a concern, you should provide as much information as possible to ensure that a proper assessment/ investigation of the issue can be carried out. Not having all of the relevant information should not, however, discourage you from reporting a suspected wrongdoing. You should not try to investigate the matter yourself. While concerns

may be reported anonymously through the Speak-Up reporting service, Glanbia encourages all employees to provide their name when making a disclosure in order to facilitate follow up questions where necessary to assist our review or investigation. Concerns expressed anonymously often prove more difficult and sometimes impossible to investigate. It should be noted that the Speak-Up hotline is not just a method by which to report concerns, it is also a very useful resource for information and advice, which all employees are encouraged to avail of should the need arise. Contact information for the Speak-Up Line (Safe Call) can be found in Appendix 1 of this policy.

If the individual feels that they are unable to raise the matter via one of the listed channels, or if they have done so and believe that the concern has not addressed, the worker should contact the Group Secretary.

Where a concern is raised via a third party, for example, through receipt of a legal or union representative letter, this concern should be immediately forwarded directly to the Group Secretary for processing.

Anonymous disclosures are not encouraged, as proper investigation may be more difficult or even impossible if we cannot obtain further information from you.

Local laws recognise that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or public enforcement authority. In Ireland, a worker may make a disclosure to one of the **'prescribed persons'** outlined in applicable legislation or the Office of the Protected Disclosures Commissioner, if the worker reasonably believes that the relevant wrongdoing is within the remit of the prescribed person and the information the worker discloses and any allegation in it are substantially true. A full list of 'prescribed persons' is set out on the www.gov.ie website.

We strongly encourage you to seek advice before reporting a concern to anyone external other than our external hotline provider.

Any engagement with the media is governed by our Code of Conduct and should always be respected.

10. Initial Assessment

The recipient within Glanbia will aim to acknowledge, in writing to the individual, the disclosure within **7 days** after receipt of the disclosure.

Once a worker has made a disclosure under this policy, the recipient will carry out an initial assessment to determine whether there is evidence that a relevant wrongdoing may have occurred. If necessary to make an initial assessment, the recipient will seek further information from the worker.

If, having carried out the initial assessment, the recipient decides that there is no evidence that a relevant wrongdoing may have occurred, the recipient will close this procedure or, if it is clear that the concern falls more appropriately within a different Glanbia policy/procedure, the worker will be informed that it should progress in accordance with that procedure. The recipient will inform the worker, in writing, as soon as practicable, of the decision and the reasons for it.

Where appropriate the recipient may designate an alternate or impartial person to assess the disclosure.

11. Investigation

If, having carried out an initial assessment, the recipient (or its duly appointed alternate) decides that there is evidence that a relevant wrongdoing may have occurred, appropriate action will be taken, which may include the appointment of a person or persons (either internal or external to Glanbia) to investigate the disclosure (the **"Investigator(s)"**). The scope and terms of reference of any investigation may be determined by Glanbia prior to any investigation being carried out.

The Investigator will aim to provide feedback to the worker within a reasonable time, being approximately not more than 3 months from the date the acknowledgement of receipt of the report was sent to the worker. Feedback should include information on the progress of the investigation and its likely timescale. However, in certain circumstances the need for confidentiality may prevent Glanbia from giving the worker specific details of the investigation or any action taken as a result. The worker should treat any information about the investigation as strictly confidential. Any breach of this confidentiality may result in disciplinary action, up to and including dismissal.

Where the worker so requests in writing, the Investigator will provide further feedback at intervals of 3 months until such time as the procedure concerned is closed.

Other appropriate action that may be taken by Glanbia includes, but is not limited to, the following:

- changes to the way Glanbia conducts its operations;
- a decision to commence disciplinary proceedings under the Disciplinary Procedure;
- referral of the matter for consideration under another of Glanbia's policies or procedures; and/or
- the making of a report to an appropriate third party, such as a regulatory body, State agencies or law enforcement.

It should be noted that fair and due process requires that any person accused of wrongdoing should be made aware of and given the opportunity to respond to any allegations made against them.

If the Investigator(s) conclude(s) that the worker has made a false or malicious complaint, they may be subject to disciplinary action in accordance with the Glanbia's Disciplinary Policy.

12. Manager Responsibilities

All Supervisors/Managers are responsible for ensuring that this policy is communicated and applied within their own area.

If they receive a report of a concern (in their capacity as Line Manager or otherwise), they should:

- deal promptly with the issue raised in accordance with this policy and any other applicable Glanbia policies, seeking guidance from relevant Group functions such as HR, finance, or legal where necessary; and
- promptly refer to HR so that all genuine concerns/disclosures, in accordance with the provisions of this policy, can be investigated under the direction of HR and other relevant functions as appropriate; and
- protect the identity of the individual raising a concern by taking all reasonable steps to avoid disclosure of any information other than as strictly necessary to investigate the concerns raised and to the extent practicable keep the information received confidential.

13. Review Process

Should you be dissatisfied with any action taken in respect of your concern, you can raise the concern with other channels specified in section 9. Raising a Concern in this policy. Alternatively, you may raise your concern directly to the Independent Non-Executive Director who is responsible for overseeing workforce engagement

14. Monitoring

Our Corporate Compliance Committee monitors the effectiveness of the Speak-Up policy, oversees material investigation into allegations of breaches of our Code of Conduct, policies and any laws or regulations. They also provide advice to the business on remedial actions and share lessons learned across the business.

The Group Operating Executive is provided with an annual report about suspected wrongdoing including reports under the Speak-Up line.

The Audit Committee will be provided with an annual report on the Speak-Up line and the manner in which concerns are being resolved.

Corporate Compliance Committee Members

Chairman

Group Secretary

Member

Group Finance Director

Member

Group Human Resource Officer

Member

Chief ESG and Corporate Affairs Officer

Appendix 1: Speak-Up Line - Safe Call Contact Information

Country	Phone Number
Australia	1 800 312928
Belgium	00 800 72332255
Brazil	0800 892 1750
Canada	1877 59 98073
China (Shanghai, Suzhou, Beijing)	China Unicom/Netcom 10800 7440605
	China Telecom 10800 4400682
Denmark	00 800 72332255
France	00 800 72332255
Germany	00 800 72332255
India	000 800 4401256
Indonesia	001 803 440884
Ireland	1800 812740
Japan	0120 921067
Jordan	+44 191 516 7756 (Not toll free)
Malaysia	1800 220 054
Mexico	01800 1231758
Netherlands	00 800 7233 2255
New Zealand	00 800 7233 2255
Northern Ireland	0800 915 1571
Norway	00 800 7233 2255
Philippines	1800 144 10499
Poland	00 800 72332255
Portugal	00 800 72332255
Russia	810 800 72332255
Singapore	800 4481773
South Africa	0800 990243
South Korea	001 800 72332255 (Korea Telecom)
	002 800 72332255 (Dacom)
Spain	00 800 72332255
Sweden	0850 252 122
Thailand	001 800 72332255
UAE	8000 441 3376
United Kingdom	0800 9151571
Uruguay	0004 044037
USA	1 866 901 3295
Vietnam (Mobifone)	120 020036
Vietnam (VNPT)	120 111157
Vietnam (Viettel)	122 80725