Glanbia

Speak Up

Policy

The Glanbia plc group ("Glanbia") is a global business operating in diverse cultures and business environments. We are committed to conducting business in accordance with the law and 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 Glanbia stakeholders to "Speak-Up" and report any situation where they have a genuine concern that a breach or potential breach of policy, our Code of Conduct, or the law has occurred. This includes suspected wrongdoing, illegal practices, unethical behaviour and/or actions that may have a negative impact on human rights, the environment and society in general.

Any individual, employee or other worker who decides to Speak-Up will be protected and, where possible, any concerns raised will be dealt with confidentially, sensitively and appropriately, in accordance with this policy. Disclosures should relate to suspected misconduct or wrong-doing connected to our operations and business activities, including (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;
- Market abuse including but not limited to insider dealing, unlawful disclosure of inside information, market manipulation or related attempts;
- Questionable accounting or non-financial reporting practices and/or non-compliance with Glanbia reporting policies or with IFRS;
- · Conflicts of interest;
- · Environmental, food safety and quality issues, health and safety issues;
- · Information security breaches;
- · Other unethical conduct including harassment, bullying or discrimination; and
- Any situation that is causing or might cause a negative impact to human rights, the environment and/or society.

The location of the relevant wrong-doing is immaterial and should not discourage you from speaking up (refer to Section 4). Where serious non-compliance 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). In the case of employees, it is important to note that the Speak Up Policy does not cover general workplace grievances. Matters related to terms of employment or personal workplace concerns such as overtime, promotions or similar issues should be referred to your local HR manager to be handled in accordance with the appropriate HR policy. We encourage our employees, other workers, and Glanbia stakeholders to read this policy carefully. Should you have any questions regarding this policy, please refer them to the Group Secretary mailbox: groupsecretary@glanbia.com.

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 any individual, to report any situation where they have a genuine concern 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, unethical behaviour and/or be causing an actual or possible negative impact to human rights, the environment and society in general.

Any individual who decides to Speak Up will be protected insofar as possible, and any concerns raised will be dealt with in confidence, sensitively and appropriately as outlined in this policy, in both our internal and external communications.

1. Purpose

We greatly value the contributions of any individual, who identifies genuine concerns related to actual or potential wrongdoing or negative impacts caused by our operations, including our subsidiaries, and/or the operations of our business partners. Speaking up is essential for us to sustain our reputation, success and ability to operate effectively. 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:

- to encourage the prompt reporting of suspected wrongdoing, in the knowledge that reports will be taken seriously and investigated as appropriate;
- to provide guidance on how to raise concerns and how concerns will be addressed in a clear, formal and safe manner; and
- 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 individuals (including employees, other workers and external parties), who may be or are impacted by Glanbia's operations, or to anyone that has information in this regard, who we encourage to raise genuine concerns via the channels outlined in Section 9 of this policy.

Breach of this policy may result in disciplinary action in line with the Glanbia Global Disciplinary Policy, 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

Employees and other 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, and employees and other workers are required to comply with this policy during their employment with Glanbia.

4. Types of Issues Covered

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

Breach of the Glanbia 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;
- Market abuse including but not limited to insider dealing, unlawful disclosure of inside information, market manipulation or related attempts;
- Questionable accounting or non-financial reporting practices e.g., non-compliance with Glanbia's reporting policies or with IFRS;
- · Conflicts of interest;
- Environment, food safety and quality issues, 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 and stakeholders, damage to the environment):
- Information security breach e.g., improper disclosure of confidential information or failure and/or delay in reporting a missing laptop or other device storing company information;
- · Other unethical conduct;
- · Unlawful or improper use of funds or resources from a public body;
- An act or omission by or on behalf of a state body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement;
- An act or omission that is unlawful or that defeats the object or purpose of applicable rules, or the deliberate concealment or destruction of information, relating to the following areas:
 - · procurement;
 - · financial transactions and the prevention of money laundering and terrorist financing;
 - · product safety and compliance;
 - · transport safety;
 - · protection of the environment;
 - · food and feed safety and animal health and welfare;
 - · public health;
 - · consumer protection;
 - · protection of privacy and personal data, and security of network and information systems; and
 - in general, any situation derived from Glanbia's operations that is causing or might cause a negative impact to human rights, the environment and society, including whistleblowing concerns. Whistleblowing occurs when any individual raises a concern or discloses information relating to wrongdoing, illegal practices, unethical conduct, and/or a business activity that might be causing an actual or possible negative which has come to their attention.

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

Certain concerns may be more appropriately addressed in accordance with Glanbia's other policies or procedures. Issues in relation to your personal circumstances, such as terms of employment, overtime, promotions or other workplace grievances may be referred to your local HR Manager. Work-related grievances may be reviewed in accordance with our grievance and disciplinary policies. If an employee or other worker reports an issue through such policies which should be dealt with under this policy, management or HR may submit the concern through the Speak Up process outlined in this policy. If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out at paragraph 4 above (for example, a breach of our Code of Conduct), you should discuss with management or HR which route is the most appropriate.

If you are an external individual and are unsure whether this is the most appropriate avenue, please raise your concern. If it is not the correct channel, we will redirect your concern to the relevant area.

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

6. Protection from Penalisation

Any individual who raises a genuine concern will not be penalised for doing so by Glanbia, and Glanbia strictly prohibits any retaliation against any individual who raises concerns in good faith. Penalisation or retaliation 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 an individual. The following actions may be considered as acts of penalisation or retaliation only if such actions are taken against the Individual as a result of the Individual making a report (as determined by Glanbia in its sole discretion):

- · 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;
- · Causing 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 employee or other worker had a legitimate expectation that he or she would be offered permanent employment;
- Failure to renew or early termination of a temporary contract where the employee or other worker had a legitimate expectation that his or her temporary contract would be renewed;
- Harm, including to the employee or other workers' 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
 individual 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; or
- · Unilateral Psychiatric or medical referrals.

This list is not exhaustive.

If an individual believes that they have suffered any such treatment, as a result of raising a genuine concern, they should inform the Group Secretary immediately, via the Group Secretary mailbox: groupsecretary@glanbia.com

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

7. Confidentiality

All Speak Up reports will be treated in a confidential and sensitive manner. Only persons authorised to receive and/or handle reports (and their support) have access to incoming reports. Identities of reporters, persons concerned and others are confidential. Glanbia will ensure that the identities of those who Speak Up are protected and disclosure shall take place in limited circumstances as required by applicable laws. The focus will be on the wrongdoing rather than the individual making the disclosure. However, situations may arise where confidentiality cannot be maintained, such as when required by law or local regulators, or where it is deemed necessary to provide a statement in an investigation. Should this be the case, Glanbia will make every effort to inform the individual making the disclosure at the earliest opportunity.

Here are some of the measures we take to protect you:

- Confidentiality: We handle all reports confidentially. Regardless of whether you are an employee or not, your identity will be safeguarded during the reporting process insofar as possible.
- Safety: We take steps to ensure that sharing information about a concern does not endanger your safety. This includes avoiding any disclosure, where possible, that could reveal your identity. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- Sensitive Handling: Our commitment extends to both internal and external communications. Any concerns raised by employees and non-employees will be dealt with sensitively and appropriately.

8. False Allegations

Individuals who use our Speak Up channel are not expected to prove the truth of an allegation. However, they must have a genuine concern relating to any of the suspected wrongdoings in Section 4. The policy must not be used to make knowingly false allegations or to pursue personal disputes. Where it is determined that an individual has knowingly made false allegations or acted with malicious intent or bad faith, appropriate disciplinary action may be taken, up to and including dismissal.

9. Channels for 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 individual raising a concern must exercise discretion and commit to keeping the reporting and investigation process confidential.

Methods of Disclosure:

- Oral or Written Disclosures: While disclosures can be made orally, we encourage individuals to submit their concerns in writing or via the independent Speak Up Line (referenced below). This ensures clarity and documentation.
- **Cultural Considerations:** We recognise that cultural norms and communication styles vary. Our commitment to confidentiality applies universally, regardless of cultural backgrounds. We encourage respectful and culturally sensitive communication.
- Accessibility: We provide accessible channels for reporting via our SafeCall channel and our Speak Up webbased system which may be accessed at www.safecall.co.uk/glanbia and includes accessible reporting options in multiple languages.

The individual making a disclosure 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;
- · who was involved;
- · when and where it occurred;
- · has Glanbia been put at risk or suffered loss as a result;
- · has it happened previously;
- · 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:

Employees and other workers can raise concerns via:

- · Your Line Manager; or
- · Senior Local Management; or
- · Senior Group Management.

All individuals can raise concerns via:

The Independent Speak Up Reporting Service (Safe Call). This facility allows the option to raise a concern anonymously or to provide a name with the disclosure. In reporting a concern, the individual should provide as much information as possible to ensure that a proper assessment and/or investigation of the issue can be completed. Not having all of the relevant information should not, however, discourage an individual from reporting a suspected wrongdoing. Individuals should not try to investigate the matter themselves. While concerns may be reported anonymously through the Speak Up reporting service, Glanbia encourages all individuals 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 line is not just a method by which to report concerns, it is also a very useful resource for information and advice, which all individuals 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.

• The Speak Up web-based system, which is available in a number of languages, may be accessed at www.safecall.co.uk/glanbia. If you choose to submit an online report, you will need to complete an online form outlining your concern(s). You will be given a pin number so that you can follow up on the report. Once the report is placed on the Speak Up secure server, it is made available to you and the selected Glanbia report recipients. To ensure confidentiality, reports are only available by accessing the Speak Up secure server. The system ensures that reports are never shared with an implicated party, even if that person typically has access to the reports.

If an 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 been addressed, the individual can contact the Group Secretary, via the Group Secretary mailbox: groupsecretary@glanbia.com

Where a concern is raised via a third party, for example, through receipt of a legal or union representative letter, or a civil society organisation, this concern should be immediately forwarded directly to the Group Secretary, via the Group Secretary mailbox: groupsecretary@glanbia.com

Local laws recognise that, in certain circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator or public enforcement authority. Please refer to Appendix 2 for further information.

We encourage you to seek advice before reporting a concern to an external party, other than our designated external hotline provider. Any engagement with the media is governed by our Code of Conduct and should always be handled in accordance with the policy, and any external communications will be subject to all applicable company policies and your confidentiality obligations to Glanbia (subject to applicable local laws).

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, client, supplier or service provider. In certain circumstances, the law will protect an individual if they raise the matter with the third party directly. However, we encourage individuals to report such concerns internally first, in line with this policy.

10. Initial Assessment

Where a concern has been raised, acknowledgment of receipt will be provided within seven calendar days and feedback on the current status will be provided no later than three-months after the acknowledgment of receipt.

Once an individual makes a disclosure under this policy, an appropriate recipient will carry out an initial assessment to determine whether there is evidence that a relevant wrongdoing may have occurred. If additional information is required to complete this assessment, it will be requested from the individual.

A written summary of the individual's concern will be provided to them after the meeting. Glanbia will also aim to give the individual an indication of how we propose to deal with the matter.

If, following an initial assessment, the recipient determines that there is no evidence of wrongdoing, or that the concern would be more appropriately addressed under a different Glanbia policy/procedure, this process will be closed. The recipient will inform the individual, in writing, as soon as practicable, of the outcome and the reasoning behind the decision. Where appropriate, the recipient may designate an alternate or impartial person to assess the disclosure.

11. Investigation

If, following an initial assessment, the recipient (or its duly appointed alternate) determines that there is evidence indicating that a relevant wrongdoing may have occurred, appropriate action will be taken, which may include the appointment of one or more individuals (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 individual within a reasonable time, being approximately not more than 3 months, or in line with local practices or requirements, from the date the acknowledgement of receipt of the report was sent to the individual. Feedback should include information on the progress of the investigation and its expected timeline. However, in certain circumstances confidentiality requirements may prevent Glanbia from sharing specific details of the investigation or any action taken as a result with the individual. All information provided during the investigation must be treated as strictly confidential. Any breach of this confidentiality may result in disciplinary action, up to and including dismissal.

Where the individual so requests in writing, the investigator will provide further feedback at intervals of 3 months until such time as the procedure concerned is closed. Individuals may also request a meeting with the company's representatives at an appropriate level to discuss actual or potential severe adverse impacts related to their complaint, as well as potential remediation.

Other appropriate actions that Glanbia may take include, but are not limited to, the following:

- · implementing changes to how Glanbia conducts its operations;
- · initiating disciplinary proceedings under the Glanbia Global Disciplinary Policy;
- · referral of the matter for consideration under another of Glanbia's policies or procedures;
- the making of a report to an appropriate third party, such as a regulatory body, state agency or law enforcement; and/ or
- initiating immediate actions to cease, mitigate and remedy any negative adverse impact which has been identified.

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 disciplinary proceedings against an employee are required, following the investigation, the conduct of the disciplinary procedure will be subject to the Glanbia Global Disciplinary Policy.

12. Manager Responsibilities

All people leaders are responsible for ensuring that this policy is communicated and applied within their own area of responsibility.

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

- address the issue promptly 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;
- promptly refer the matter to HR to ensure 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
- take all reasonable steps to protect the identity of the individual raising the concern, disclosing information only as strictly necessary to investigate the concerns raised and maintain confidentiality to the greatest extent practicable.

The above is also applicable to any people leaders who oversee external individuals and are accountable for ensuring that this policy is effectively communicated externally to all individuals within their respective areas of responsibility.

13. Review Process

Should you be dissatisfied with the outcome or response to your concern, you may raise the concern through the alternative channels specified in Section 9 of this policy. In addition, you may raise your concern via email to groupsecretary@glanbia.com.

14. Monitoring

Our Group Internal Audit function monitors the effectiveness of the Speak Up policy. This policy is reviewed at least annually by the Group Secretary. The Audit Committee are provided with an annual update on the SafeCall channel and the manner in which concerns are being resolved.

We greatly value your feedback and suggestions for improving our channel. If you have any comments, suggestions or queries regarding accessibility, cultural appropriateness, or any other aspect of the service, please feel free to share them with us via email to groupsecretary@glanbia.com. Your insights help us enhance our services and ensure that we continue to meet your needs effectively.

15. Other related policies

- · Glanbia Code of Conduct
- · Glanbia Supplier Code of Conduct
- · Glanbia Anti Bribery & Corruption Policy
- · Glanbia Human Rights Policy

Appendix 1: Safecall Contact Information

Contact Safecall, an Independent Service for Raising Concerns

If you have a concern about a legal or ethical issue and are not comfortable using one of the standard internal methods, you can contact Safecall, an independent service for raising concerns.



You can use the following Freephone numbers:

Country	Phone Number
Australia	1 800 312928
Belgium	00 800 72332255
Brazil	0800 892 1750
Canada	1877 59 98073
China	4008 833 405
Denmark	00 80 25 41 90
France	00 800 72332255
Germany	00 800 72332255
India	000 800 4401256
Indonesia	001 803 440884
Ireland	1800 812740
Japan	0120 921067
Bangladesh	+44 191 516 7756 (Not toll free)
Malaysia	1800 220 054
Mexico	800 1231758
Netherlands	00 800 7233 2255
New Zealand	00 800 7233 2255
Northern Ireland	0800 915 1571
Norway	00 800 7233 2255
Philippines	2 8 540 2694
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)	121 020036
Vietnam (VNPT)	120 111157
Vietnam (Viettel)	122 80725

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Appendix 2: External reporting channels and local guidance

Local laws recognise that, in certain circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator or public enforcement authority.

We encourage you to seek advice before reporting a concern to an external party, other than our designated external hotline provider. Any engagement with the media is governed by our Code of Conduct and should always be handled in accordance with the policy.

Ireland

In Ireland, individuals who raise concerns about possible wrongdoing in the workplace are protected by the Protected Disclosures Act 2014 which was updated by the Protected Disclosures (Amendment) Act 2022 (the "2022 Act"). The 2022 Act also transposes the EU Whistleblowing Directive into Irish law.

A concern may be reported externally to the Office of the Protected Disclosure Commissioner or to one of the 'prescribed persons' (an individual or body designated under the Protected Disclosures Act 2014 (as amended by the 2022 Act) to receive disclosures of wrongdoing in certain sectors. Prescribed persons are considered independent and are typically regulators or oversight bodies with responsibilities relevant to the subject matter of the disclosure. Prescribed persons provide an alternative route for individuals to report concerns if they do not wish to disclose internally.

An individual must believe that the relevant wrongdoing is within the remit of the prescribed person and that the information the individual discloses and any allegation in it are substantially true.

A list of 'prescribed persons' is available at https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/collections/protected-disclosures-whistleblowing-list-of-prescribed-persons/

Germany

In addition to the reporting lines set out in this Policy, for the German Glanbia entities, employees are able to report to an external ombudsperson that acts independently and ensures that reports are treated confidentially and in accordance with the Act for the Better Protection of Whistleblowers (Gesetz für einen besseren Schutz hinweisgebender Personen).

• The ombudsperson can be reached via: VertrauensanwaltGlanbia@eversheds-sutherland.com

Upon request, the ombudsperson will arrange an in-person meeting or a video meeting within a reasonable time to file a report.

Personal data collected in the context of whistleblower reports will be retained for a period of five years. Extended retention is permitted only in accordance with applicable laws. Upon expiry of the retention period or cessation of the purpose, Glanbia undertakes to delete the relevant data in compliance with applicable data protection regulations. Data processing is carried out exclusively for specified purposes, in a confidential manner, and in accordance with applicable data protection requirements.

In addition to the internal reporting options, Glanbia employees in Germany may also make reports externally via the following reporting lines:

- · Federal Office of Justice (Bundesamt für Justiz): https://bfj-hinweisgeberstelle.dataport.de/#/
- Federal Financial Supervisory Authority: https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/ hinweisgeberstelle_node.html
- Federal Cartel Office (Bundeskartellamt): https://www.bundeskartellamt.de/DE/Kartellverbot/Anonyme_ Hinweise/anonymehinweise_node.html

United Kingdom

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases an individual should not find it necessary to alert anyone externally. However, UK law recognises that in some circumstances it may be appropriate for an individual to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. Individuals are strongly encouraged to seek advice before reporting a concern to anyone external.

In addition to the internal reporting options, Glanbia employees in the United Kingdom may also make reports externally via the following reporting lines:

The independent whistleblowing charity, Protect, operates a confidential helpline. Their contact details are:

Helpline: 020 3117 2520

Website: https://protect-advice.org.uk

Personal data gathered in the context of whistleblower reports must be retained only for as long as necessary for the purposes for which it was collected. Personal data that is no longer required will be deleted or anonymised.

