

SPEAK UP POLICY

RE: AB World Foods Commitment

At AB World Foods we do business the right way. Good governance and ethical behaviour are at the heart of our agenda. We are committed to always acting with integrity. We proudly promote and protect a culture of trust, fairness and accountability that puts ethics first.

We promote a culture of openness. We know that we are a stronger company when our people feel empowered to Speak Up. We encourage effective and honest communication at all levels of the organisation.

If any individual working at any level of the organisation becomes aware of anything they believe to be inappropriate, improper, dishonest, illegal or dangerous, we want them to come forward and express their concerns.

We understand that individuals may feel nervous about Speaking Up, so we will ensure they are protected from negative consequences as a result of Speaking Up. We hope that individuals feel able to Speak Up internally; we advise our managers on how to deal with these issues discreetly and appropriately; but failing that we have a confidential and anonymous (where allowed) external mechanism for Speaking Up.

By Speaking Up, individuals allow us to take action to address their concerns, do the right thing and create a better workplace for everyone.

Responsibility for oversight of this Policy rests with the Audit Committee of the Associated British Foods plc (ABF) Board.

WHY should you SPEAK UP?

AB World Foods encourages an open culture in all its dealings with employees and other people with whom it comes into contact. Effective and honest communication is essential if incidences of inappropriate, improper, dishonest, illegal or dangerous behaviour are to be dealt with effectively.

By letting us know about your concerns, we can ensure that they are addressed appropriately, and you can help us safeguard the interests of our employees, our organisation and the wider community.

WHO does SPEAK UP apply to?

We encourage all individuals working for AB World Foods in any country and in any capacity to Speak Up, including employees at all levels, directors, officers, part-time and fixed-term workers, casual and agency workers, seconded workers and volunteers.

Where appropriate, we also encourage third parties who are associated with AB World Foods to Speak Up, including shareholders, suppliers, agents, contractors, external consultants, third-party representatives, business partners and sponsors.

All individuals working for AB World Foods and third parties are welcome to use any of the reporting channels set out in this Policy.

WHAT should you SPEAK UP about?

If you have a genuine belief that inappropriate, improper, dishonest, illegal or dangerous behaviour is occurring, you can raise your concern in the confidence that we will support you.

The aim of the Speak Up programme is to provide a mechanism for reporting, investigating and remedying inappropriate behaviour. Inappropriate behaviour takes place where an individual or individuals associated with AB World Foods has done, is doing or is going to do something which is inappropriate, improper, dishonest, illegal or dangerous. This includes:

- acting illegally;
- acting unethically;
- acting in breach of operating regulations;
- engaging in fraud;
- failing to comply with legal obligations;
- effecting a miscarriage of justice;
- endangering the health or the physical or moral integrity of an individual;
- causing damage to the environment;
- engaging in bribery;
- facilitating tax evasion;
- engaging in human rights or modern slavery breaches;
- engaging in unauthorized disclosure of confidential information or other data breaches;
- breaching any ABF or [ABF company] policy;
- discriminating against an individual;
- engaging in sexual or psychological harassment;
- serious irregularities including in relation to the following:
 - accounting;
 - internal accounting control;
 - auditing;
 - banking and financial crimes;
 - infringement of intellectual property rights;
 - conflicts of interest; and
- deliberate concealment of any of the above.

This is not an exhaustive list, therefore if there is anything else that is causing you concern or you think we should be aware of, please do Speak Up.

Please be aware that Speak Up procedures are not a substitute for normal workplace grievance procedures or other relevant policies. In particular, you should not use the procedures outlined in this document to raise matters in relation to your personal circumstances such as your terms and conditions of employment. If you are uncertain whether something is within the scope of this Policy, or if you would like to speak to someone in confidence prior to making a formal report, you should seek advice from any of the contacts identified below.

HOW do you SPEAK UP?

Option 1: Tell your line manager/head of department

If you are concerned about any form of inappropriate behaviour, you should feel able to raise it first with your line manager. This is the normal way in which you should first raise the issue. There is no special procedure for doing this - you can tell them about the problem or put it in writing if you prefer.

Option 2: Tell one of the alternative internal contacts

If you feel unable to raise the matter with someone in your immediate line management, or if you feel that your line manager has not addressed your concern, please bring the issue to the attention of your Speak Up Officer or one of the Alternative Contacts identified below. Again, you can tell them about the problem or put it in writing if you prefer.

If you have reasonable grounds for believing that the Senior Leadership Team of your employing company or that the ABF board of directors may be involved or condoning the activity, you should first contact the Director of Legal Services of ABF whose contact details appear in the section 'Alternative Contacts' below.

Internal reporting is the best way to get information to the right people who can take early and effective action to resolve or avoid risks to the public interest. Whilst you may have the right to report externally in certain circumstances, we encourage that this be considered as a last resort.

Option 3: SpeakUp line or webservice

We would hope that you feel able to report your concerns to someone internally. However, if the nature of the matter is such that you cannot raise it with any of the contacts identified or, if you have followed the internal channels listed in Options 1 and 2 and you still have concerns, you can contact the SpeakUp phone line or webservice.

If you choose to phone the SpeakUp line, you will hear a recorded message (in your local language) which asks you to provide the access code unique to your business. You are then able to record a voice message detailing your concern.

If you choose to use the SpeakUp webservice, you will need to provide the relevant access code and will then be given the opportunity to write a message detailing your concern. Text on the webservice is in your local language.

Details of the local phone numbers, web addresses and access codes for SpeakUp are available in Appendix 1 of this Policy.

A transcript of your voice message and/or a copy of any written message will be available on the webservice for review (once any voice message has been transcribed), and you are welcome to provide comments on your original message or additional information at any time.

We do not encourage anonymous reporting, but both the SpeakUp line and webservice allow you to remain anonymous if you wish (subject to any local laws which prevent anonymous whistleblowing). Where an anonymous report is made, you should ensure that you provide sufficient detail to allow the matter to be investigated. Anonymous reports that provide insufficient information may not be capable of thorough investigation.

Reports through the SpeakUp line or webservice will be passed to ABF and, if appropriate, will then be passed on to AB World Foods to be addressed in accordance with our Speak Up procedures.

WHAT will happen next?

The same process will be followed no matter which channel you have chosen to report your concern.

Once you have reported your concern, your report will be acknowledged and appropriate initial enquiries and an initial assessment of how to proceed will be carried out. This will be undertaken as quickly as possible. As part of this initial assessment you may be asked to provide additional information about your concern.

- If you have reported your concern to someone internally, you will be contacted by that person or another person appropriate to assist with the assessment. If you are asked to a meeting, you will be able to bring a colleague with you. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- If you have reported your concern through the SpeakUp line or webservice, you will receive a unique case number. If you go back into the SpeakUp line or webservice and use this number, you will be able to listen/read the acknowledgement of your report (within 7 days), any requests for more information and any update on the status of your concern.

The initial assessment may lead to a formal investigation which, depending on what is found, will determine the action to be taken and the timescales involved.

You will be provided with feedback in relation to your report. Where possible, you will be informed of the outcome of any enquiries and investigations and any actions taken (subject to confidentiality requirements).

If your concern falls more properly within other policies (e.g. disciplinary or workplace grievance), your contact will tell you.

If you are unhappy with the response you receive, remember you can go to any of the other contacts detailed in this Policy. AB World Foods is committed to ensuring any such issues are handled fairly and properly.

HOW will we protect you?

From repercussions

We will not tolerate the victimisation of anyone raising a genuine concern: we will ensure that you are supported and protected from adverse repercussions, retaliation or detriment.

Provided you have a reasonable belief that something inappropriate has occurred, is occurring or is likely to occur, it doesn't matter if you are mistaken.

Having raised your concern, the person to whom the disclosure has been made will, unless otherwise advised, act as your point of contact in the matter. Should you feel that there is any detriment to you or your career, as a result of raising the concern, this should be reported immediately to your contact or one of the other contacts listed in the section 'Alternative Contacts' below.

It is a disciplinary offence to threaten, treat detrimentally, or retaliate against those who Speak Up in any way.

It is also a disciplinary offence to raise an allegation maliciously or dishonestly.

Your identity

We hope you feel able to Speak Up openly. However, if you want to raise a concern confidentially, we will take all reasonable steps to keep your identity secret. We will only make your name known to those people who need to know it in order to investigate the allegation or otherwise as required by law.

We do not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you and it may be more difficult to establish whether any allegations are credible.

If you wish to be completely anonymous, you can contact the external SpeakUp line. Anonymity is possible in countries where this is legally allowed. Sometimes this will depend on the nature of your concern.

PRIVACY

Any personal data that identifies you or another person obtained as part of any concern raised under this Policy will only be used for the purposes described in this Policy and in accordance with relevant data protection laws. See the Privacy Notice which is attached as Appendix 2 to this Policy for more information about how ABF handles personal data submitted through the SpeakUp line and webservice, which applies in addition to any data protection policies or notices held locally.

Individuals whose data is handled through the SpeakUp line and webservice have rights provided by data protection law as further explained in the applicable Privacy Notice.

OTHER

Where required, this Policy has been agreed/implemented following consultation with the local Works Council.

Unless otherwise provided for by law, this Policy does not form part of any employee's contract of employment and we may amend it at any time.

ALTERNATIVE CONTACTS

For Internal Use Only