

# Speak Up procedure



The Speak Up procedure is made available in several languages.

**Royal FrieslandCampina N.V.**

Stationsplein 4, 3818 LE Amersfoort

The Netherlands

T +31 33 713 3333

[www.frieslandcampina.com](http://www.frieslandcampina.com)

## FrieslandCampina's commitment

Our purpose of *nourishing by nature* is at the heart of everything we do at FrieslandCampina. We develop affordable food, with attention to quality, sustainability and integrity, to make a positive contribution to the future of humanity and our planet.

Integrity is an important part of our corporate culture. To remain successful in the long term, it is important that we do business with integrity, by doing the right thing.

Our code of conduct Compass sets out how we should behave: with integrity and in a respectful and transparent manner. Compass applies worldwide and under any circumstances. It is the responsibility of every employee to know and comply with Compass.

Employees who are concerned about possible breaches of Compass or related laws are encouraged to share their concerns with us. We understand that it takes courage to speak up, but I would like to emphasise that everyone at FrieslandCampina is welcome to voice their concerns. When you speak up, you will be protected.

This Speak Up procedure explains how you can voice concerns or doubts about certain behaviour or abuses in the workplace and report them. If you prefer, this can be done confidentially.

I hope you will contribute to FrieslandCampina by voicing your concerns and reporting issues. To create a culture that is open and transparent and where we really do the right things for our organisation in the long term, we need to work together. For now and for future generations.

If you still have questions after reading this Speak Up procedure, please contact your direct supervisor or HR manager.

Hein Schumacher  
Chief Executive Officer  
Royal FrieslandCampina N.V.

# Table of contents

|                                                                                                       |           |
|-------------------------------------------------------------------------------------------------------|-----------|
| <b>Speak Up procedure: Why, Who, What, When and How?</b>                                              | <b>7</b>  |
| 1. WHY are you encouraged to Speak Up?                                                                | 7         |
| 2. WHO can use this Speak Up procedure?                                                               | 7         |
| 3. WHAT kind of issues can you raise?                                                                 | 8         |
| 4. WHEN to Speak Up?                                                                                  | 9         |
| 5. HOW to Speak Up?                                                                                   | 9         |
| <br>                                                                                                  |           |
| <b>What happens after you file a Speak Up report?</b>                                                 | <b>12</b> |
| 6. We first screen your report                                                                        | 12        |
| 7. We will investigate your report                                                                    | 12        |
| 8. Persons involved will be informed                                                                  | 13        |
| 9. You will receive a status update of the investigation                                              | 13        |
| 10. If your concern was justified, measures will be taken                                             | 13        |
| 11. You will be informed about the outcome                                                            | 14        |
| 12. If you are not happy with the outcome                                                             | 14        |
| 13. If you consider reporting to an outside party                                                     | 14        |
| <br>                                                                                                  |           |
| <b>The Integrity Committee</b>                                                                        | <b>16</b> |
| 14. Integrity Committee                                                                               | 16        |
| <br>                                                                                                  |           |
| <b>How do we protect you?</b>                                                                         | <b>18</b> |
| 15. No negative effects if you report in good faith                                                   | 18        |
| 16. Your identity will be protected                                                                   | 18        |
| 17. Privacy                                                                                           | 19        |
| <br>                                                                                                  |           |
| <b>Amendment of this Speak Up procedure, unforeseen circumstances and conflict with mandatory law</b> | <b>21</b> |
| <br>                                                                                                  |           |
| <b>Annex</b>                                                                                          | <b>22</b> |



# Speak Up procedure: Why, Who, What, When and How?

## 1. **WHY are you encouraged to Speak Up?**

We want to do business the right way, responsibly. Part of this is to create a culture of openness in which we all help to bring our company to an even higher level of integrity. A culture in which we all feel comfortable raising questions and concerns related in any way to Compass.

When you tell us your concerns about behaviour that is not in line with Compass, you help us to take action and improve the situation, before it is too late. If you remain silent, this can only make the situation worse.

## 2. **WHO can use this Speak Up procedure?**

We invite all employees and other stakeholders to raise concerns. Any person or third party that is impacted by or that observes misconduct of FrieslandCampina, its employees or business partners representing FrieslandCampina can use this procedure. The aim should always be to improve our company in doing business the right way, responsibly.

### 3. WHAT kind of issues can you raise?

You can raise any issue that you believe is not in line with Compass or with applicable laws on any of the Compass topics (“violations”)

Examples of violations that can be raised using this Speak Up Procedure are:

|                                                            |                                                                    |                                          |
|------------------------------------------------------------|--------------------------------------------------------------------|------------------------------------------|
| • Discrimination, bullying and (sexual) harassment         | • Safety, health or environmental incidents                        | • Disclosure of confidential information |
| • Retaliation against anyone for speaking up in good faith | • Deceptive, false, artificial or inadequate (financial) reporting | • Violation of trade sanction rules      |
| • Product safety incidents                                 | • Violations of data protection laws                               | • Money laundering                       |
| • Improper use of company resources                        | • Attempts to conceal misconduct                                   | • Conflicts of interest                  |
| • Child labour or forced labour                            | • Violation of competition rules                                   | • Bribery                                |
| • Insider trading                                          | • Fraud and theft                                                  |                                          |

Concerns that cannot be raised using this Speak Up Procedure are:

- Immediate danger like fire or severe safety issues. Please use local emergency procedures.
- If you have an issue with your performance review, disagree with a decision of your manager that affects your position as employee or if you have a personal grievance (unless such decision is discriminatory).
- If the concern that you raise is already under investigation or has already been investigated, it will not be investigated again and you will be informed about that.
- Concerns in bad faith (see paragraph 15).

You can always consult the Local Trusted Representative in confidence to help you making the right choice.



#### 4. **WHEN to Speak Up?**

If you have a suspicion of a violation, we encourage you to Speak Up as soon as possible. Do not wait until you know all the facts. We do not expect you to have all the answers and we prefer that you do not start investigating any concern yourself.

#### 5. **HOW to Speak Up?**

There are different ways to raise your concern.

##### **First: contact the person(s) involved or your (HR) manager**

We encourage you to address your concern directly with the person(s) involved, especially if your concern relates to inappropriate or unwelcome behavior. You can also choose to contact your (HR) manager. If addressing your concern with the person(s) involved or your (HR) manager does not feel comfortable, did not resolve the issue or cannot resolve the issue, please feel free to file a Speak Up report.

##### **Second: file a Speak Up report**

You can file a Speak Up report with any member of your Management Team, with the Director Business Conduct or by using the Speak Up Phone & Web service.

##### **Need any help - the Local Trusted Representative**

You can always share your concern in confidence with the Local Trusted Representative, who can advise you on any next steps and help you identifying the best Speak Up channel. The Local Trusted Representative can also speak up on your behalf. Apart from exceptional cases, the Local Trusted Representative will not investigate or otherwise follow up on any concern you share.

##### **Your Management Team**

If you believe that your concern need to be investigated or (corrective) action is needed, you are encouraged to contact any member of your Management Team. They will carefully listen to you and handle your concern in accordance with this Speak Up procedure.

## **Director Business Conduct**

If you believe that your concern cannot be adequately dealt with by your Management Team, you can also choose to report to the Director Business Conduct. If your concern relates to serious law breaches, retaliation or attempts to conceal violations, you are encouraged to directly contact the Director Business Conduct. The Director Business Conduct can be contacted by:

Email: [Businessconduct@frieslandcampina.com](mailto:Businessconduct@frieslandcampina.com)

Letter: FrieslandCampina Stationsplein 4, 3818 LE Amersfoort, The Netherlands

Phone: +31 33 713 2509

## **Speak Up Phone and Web service**

If you wish to report and communicate in your own language, 24/7 or if you wish to remain anonymous, please use the Speak Up Phone or Web service. It is operated by an external service provider. The Director Business Conduct will receive a (translated) transcript of your message and is able to communicate (if you prefer so anonymously) through this service with you. Visit [speakup.frieslandcampina.com](http://speakup.frieslandcampina.com) to access the Phone & Web service portal. Here you can also find an explanation on how to communicate through the Phone & Web service.

## **What information to provide**

Please provide as much detailed information as you can. Examples are circumstances of what you saw, background, reason for the concern, names, dates and places. You can use the format as included in the Annex to this Speak Up procedure to raise your concern.

## **Contact details**

Visit [speakup.frieslandcampina.com](http://speakup.frieslandcampina.com) for the contact details of the Director Business Conduct, the Speak Up Phone & Web service and all Local Trusted Representatives.

1

**Do you suspect a Compass or related law violation, e.g.**

- I feel bullied or harassed
- I suspect fraud
- I suspect bribes are paid
- I believe competition laws are violated
- I am concerned about child labour, forced labour or freedom of association
- I am afraid confidential information is disclosed
- I see a conflict of interest situation

2

**Who can I talk to?**

If possible,

a) talk to the person involved

or

b) talk to your line manager or HR manager

or

if the above does not feel comfortable, did not resolve the issue or cannot resolve the issue, please feel free to file a Speak Up report

3

**File a Speak Up report to**

c) any member of your management team

or

especially if your concern relates to serious law breaches, retaliation or attempts to conceal violations

d) Director Business Conduct - [businessconduct@frieslandcampina.com](mailto:businessconduct@frieslandcampina.com)

or

if you want to remain anonymous and report in your own language

e) The Speak Up Phone and Web service - [speakup.frieslandcampina.com](https://speakup.frieslandcampina.com)

**We treat all cases confidentially and protect your identity if you ask us to do so.**

# What happens after you file a Speak Up report?

## 6. We first screen your report

The recipient of your Speak Up report will acknowledge receipt in writing (e.g. by email or through the Speak Up Phone & Web service) within 7 working days.

Each report will be screened in accordance with the FrieslandCampina Investigation Protocol to determine e.g. whether:

- there is a reasonable suspicion of a violation;
- an investigation is needed
- a different procedure applies;

Within 2 weeks after receipt of your concern, it will be decided whether or not the case you reported will be investigated. You will be informed about this decision.

## 7. We will investigate your report

Speak Up reports that qualify will be investigated and classified in accordance with the FrieslandCampina Investigation Protocol as a tier 1 or 2 case. The classification determines who in the organisation is responsible for the follow up: whether this is local management (in tier 2 cases) or the Integrity Committee (in tier 1 cases). You will be informed about the classification of your concern.

Any investigation is aimed at fact finding and is dealt with in an impartial and unbiased manner.

All employees are required to cooperate fully and promptly with an investigation unless such requirement is prohibited by law, and to answer any questions fully and honestly. In the interest of the investigation,

all employees are required not to speak about the investigation with anyone, unless such requirement is prohibited by law or the investigators indicate differently.

## **8. Persons involved will be informed**

In case you raised a concern about a specific person or such person is identified in the course of the investigation, they will be informed as soon as possible about the suspected violation. Informing the person involved can be postponed if doing this can be expected to hinder the investigation and, as a result, hinder the enforcement of FrieslandCampina's rights in the framework of legal proceedings. In the event the person involved cannot be informed immediately or completely, they will be (further) informed as soon as the investigation so permits. The person involved will be interviewed to enable them to give their view on the facts presented in the investigation report.

## **9. You will receive a status update of the investigation**

Within six weeks from the date you raised your concern, you will be informed in writing (e.g. by email or through the Speak Up Phone & Web service) about the status of the investigation. If such information cannot be provided within six weeks, you will be informed about a new date on which you can expect to receive a status update.

## **10. If your concern was justified, measures will be taken**

The investigation results are reported to the appropriate management level in accordance with the Investigation Protocol for decision making.

If the concern that you reported is partly or fully well-founded, management defines the measures to be taken to the extent permitted by law. These measures can be disciplinary measures against certain persons in line with the FrieslandCampina Policy on disciplinary measures and/or organisational measures to prevent such an incident from happening again. In tier 1 cases where the Integrity Committee decides on the matter, a deviation by local management is only allowed with the prior approval of the Director Business Conduct for instance in

case of an unforeseen change of circumstances or when measures may conflict with local law. The Director Business Conduct may consult with the Integrity Committee or any of its members before deciding on the deviation request.

## 11. You will be informed about the outcome

You will be informed about the outcome of the investigation and the decisions taken to the extent this does not conflict with the confidentiality of the case or the privacy and legal rights of the persons involved.

## 12. If you are not happy with the outcome

If, after careful consideration, you feel that

a. your concern has not been handled professionally or;

b. an investigation has not been performed correctly,

please inform the Director Business Conduct. This may help to improve this Speak Up procedure. In case the Director Business Conduct handled your concern, you can contact any member of the Integrity Committee.

## 13. If you consider reporting to an outside party

Before reporting to an outside party, you are encouraged to first report your concern through any of the channels in this Speak Up procedure.

If this is not reasonably possible, you can choose to report to the competent authorities in the specific matter at stake. This may be the case if the incident relates to an important and urgent public interest or when required by law. If, after internal reporting, you fairly believe that FrieslandCampina did not take adequate action, you may also consider reporting to the competent authorities. Other public disclosures (e.g. to the press) can only be made in line with applicable (whistleblowing protection) law and should minimise the possible negative impact to FrieslandCampina and all parties involved.

Before speaking up externally, we encourage you to inform the Director Business Conduct or the Integrity Committee about the external reporting activity you intend to follow.

Nothing in this Speak Up procedure prohibits you from reporting possible violations of laws or regulations to the authorities. No prior authorisation is required. Nevertheless we strongly encourage you to raise your concerns via this Speak Up procedure and promise to handle your report professionally and carefully.

# The Integrity Committee

## 14. Integrity Committee

The Integrity Committee is chaired by a member of our Executive Board and consists of (i) the General Counsel & Company Secretary; (ii) the Corporate Director Internal Audit; (iii) the Corporate Director HR and (iv) a Managing Director of a FrieslandCampina Operating Company. The Executive Board may also appoint one or more additional and/or substitute members of the Integrity Committee. The Director Business Conduct acts as secretary to the Integrity Committee.

The role and tasks of the Integrity Committee in relation to this Speak Up Procedure are to:

- monitor the implementation and compliance with Compass and this Speak Up procedure;
- have investigated tier 1 Speak Up cases;
- take a decision in tier 1 cases and define measures to be taken by local management;
- monitor execution of decisions of the Executive Board, the Supervisory Board, the board of management of the relevant operating company / business group or the Integrity Committee in respect to Compass and this Speak Up procedure.

In case a member of the Integrity Committee is personally involved in a reported Speak Up case, the matter will be referred to the Executive Board for further handling and investigation. A member of the Integrity Committee is obliged to disclose a personal involvement in the reported concern immediately.



In case a member of the Executive Board is personally involved in a reported concern, the same applies, save that the report will be handled and investigated by the Audit Committee of the Supervisory Board. The Audit Committee will provide its advice to the Supervisory Board, that will issue a binding advice of which no deviation is possible.



# How do we protect you?

## 15. **No negative effects if you report in good faith**

FrieslandCampina will not tolerate negative effects when you raise a concern in good faith. There will be no retaliation and any reasonable costs (at the discretion of responsible management) will be reimbursed. You shall not be put at a disadvantage. If you feel punished or treated unfairly, please contact the Director Business Conduct. Such cases will be investigated and when they turn out to be founded, local management will be instructed by the Integrity Committee to ensure that disciplinary measures are taken against the offender(s).

What does good faith mean here? It means that a person in the same circumstances would reasonably believe or suspect that a violation took place. That it was rational to raise a concern in such case. If upon investigation no violation was discovered, no action will be taken against you if you raised your concern in good faith.

The opposite is reporting in bad faith. In that case you know that you are reporting dishonestly. An example is abusing the reporting procedure because you have personal grievances. FrieslandCampina cannot allow reporting in bad faith. Making a bad faith report will result in disciplinary consequences for you, which may include dismissal.

## 16. **Your identity will be protected**

All concerns will be handled confidentially to the extent possible. Except in extenuating circumstances, detailed in part below, your name will only be known to the person that you report your concern to, to the appointed investigators and the persons involved in the investigation and follow up. We will ask your permission before sharing your identity with anyone else, including with the person(s) involved. Please help us protecting your identity by being discrete and by not discussing your concerns or an ongoing investigation with any colleagues.

If you wish to remain completely anonymous, you can contact the Speak Up Phone or Web service. Anonymity is possible in countries where this is legally allowed. Sometimes this depends on the nature of your concern.

Your identity is not communicated to others without your permission as described above. The only exceptions are if:

- this is required by law; or
- you submitted a report in bad faith; or
- an important public interest is at stake, in which case we will inform you.

Sometimes keeping your identity secret can hinder or complicate investigations. Sometimes it even prevents us to take appropriate actions. In such cases, you will be asked to reveal your identity.

## 17. Privacy

FrieslandCampina processes the personal data of all people involved in accordance with the FrieslandCampina Privacy Codes and related policies. Any personal data obtained as part of this procedure will only be used for the purposes explained here. Such data will only be given to those persons who have a need to know, to comply with the law or when an important public interest is at stake. FrieslandCampina is responsible for the processing of personal data in the context of this Speak Up procedure. The external supplier of the Speak Up Phone and Web service is only entitled to process personal data as instructed by FrieslandCampina.

Persons whose personal data are being processed under this Speak Up procedure may, at all times, and in line with the Privacy Codes, request FrieslandCampina a complete written overview of the data available about them. Such requests may be denied if this would seriously hinder the investigation and, as a result, the enforcement of rights in the framework of legal proceedings and to the extent that the data processed appear to be relevant and necessary for this purpose.



# Amendment of this Speak Up procedure, unforeseen circumstances and conflict with mandatory law

The Speak Up procedure has been adopted by the Executive Board of Royal FrieslandCampina N.V. on 20 May 2015 and is effective as of 1 January 2016. This revised version of the Speak Up procedure has been adopted by the Executive Board on 21 March 2021 and is effective as of 1 December 2021.

The Speak Up procedure can be amended and supplemented by a decision of the Executive Board of Royal FrieslandCampina N.V.

If it appears that the provisions of this Speak Up procedure, as they may be changed from time to time, are or will become in conflict with mandatory law, mandatory law will prevail.

# Annex

## Format to raise a concern with a member of your Management Team or the Director Business Conduct

### 1. Do you wish to remain anonymous within FrieslandCampina?

- ☐ yes
- ☐ no

#### Clarification

*Please note that the recipient of this report (Director Business Conduct) will always be aware of your personal data. If you do not want that, please use the external Speak Up Phone or Webservice.*

### 2. Company information

Name of your operating company/corporate staff department

-----  
Address

-----  
City

-----  
Country

*Please fill in the full physical address.*

### 3. Personal information

Your name

-----  
Your preferred phone number

-----  
Your preferred email address

-----  
Best time for communication with you

-----  
Best way of communication with you

☐ phone

☐ e-mail

☐ in person

*Please fill in your full first name and last name. You may also fill in your private phone number and private email address.*

#### 4. Report of possible violation

What is the possible violation you want to report?

Do you have a serious suspicion or are you sure?

- ☐ serious suspicion
- ☐ I am sure

When did it occur?

-----

Where did it occur?

-----

Who are, in your opinion, the persons involved?

first name - last name - function

1.

-----

2.

-----

3.

-----

- ☐ unknown

*Please fill in the location, document or transaction, as the case may be.*

*Please fill in the full first and last names and functions to the fullest extent possible.*

What is, in your opinion, the potential damage (financially or otherwise) to the company or other interested parties?

Do you think it will happen again?

- ☐ no
- ☐ yes

5. **Personal action**

How did you become aware of the situation?  
-----

Have you reported the situation to the person involved or your own manager(s) first?

- ☐ no, why not:  
-----
- ☐ yes, the outcome was:  
-----

Do you know of any other person(s) who is/are aware of the situation, not being personally involved?

- ☐ no
- ☐ yes:  
-----

Do you have any evidence, which can be handed over?

- ☐ no
- ☐ yes:  
-----

6. **Additional information**

Please describe the evidence, such as documents  
Please provide any additional information you have

-----

-----

-----

-----

-----



## Signing of this form

-----  
Date:

-----  
Place:

-----  
Name of reporter:

-----  
Signature:

## You can send the completed form to:

**Any member of your management team  
by email or to the Director Business  
Conduct by**

### **Letter**

FrieslandCampina  
Attention: Director Business Conduct  
Stationsplein 4  
3818 LE Amersfoort  
The Netherlands

### **Or by email:**

[businessconduct@frieslandcampina.com](mailto:businessconduct@frieslandcampina.com)



**Royal FrieslandCampina N.V.**  
Stationsplein 4, 3818 LE Amersfoort  
The Netherlands  
T +31 33 713 3333

[www.frieslandcampina.com](http://www.frieslandcampina.com)