

# Reporting procedure at the VanDrie Group

In our companies, we want to be open and transparent towards each other. To be fair and work with respect. That's how it should be. However, we understand that you may be faced with situations that raise doubts. Is this how it should be? Is this behaviour acceptable? Why is someone doing that? If you have doubts, share this with someone within the VanDrie Group who you trust, such as a nice colleague. You can also ask a manager for his or her opinion. Or stop by the company's confidential adviser – with whom you can share your doubts confidentially. If you can't work things out with them and don't know which way to turn, you can report this anonymously to the SpeakUp line of the VanDrie Group. We will then try to help you as effectively as possible. This document is about the SpeakUp reporting procedure. It describes how reports of abuses or wrongdoing are handled. These include a possible criminal offence or a breach of the law, fraudulent or unethical behaviour, environmental, health, animal welfare or safety issues.

## Reporting via SpeakUp

Anyone who suspects wrongdoing is encouraged to report this to a manager or confidential adviser. If someone thinks this is not an option, SpeakUp can be used. It can be reported anonymously. SpeakUp is a tool that is hosted by an independent third party. The SpeakUp tool is available to all employees (both permanent and temporary employees) but also to suppliers, customers, transporters and veal farmers. A report of a suspected abuse must be made ethically. You don't have to be certain that a suspected abuse has taken place to make a report. The VanDrie Group does not tolerate any reprisals against someone who brings up genuine doubts or suspected misconduct for discussion in good faith, even if the doubts turn out to be unfounded.

## Protection of the person reporting and the parties directly involved

Every report that is made ethically is handled confidentially. Anonymity can only be lifted if the reporter gives his/her own consent. This means that the identity of the person reporting is only disclosed if there is explicit written permission from the person reporting. The person reporting is entitled to refuse or withdraw permission at all times. In order to keep the possibility of unclear and possibly incorrect reports to a minimum, the VanDrie Group will only investigate anonymous reports that are received via SpeakUp and not via other channels.

It is not only the position of the person reporting that is protected. This also applies to the person who is possibly accused. The VanDrie Group will communicate to the person to whom the report relates that concerns have been raised with regard to him/her. The VanDrie Group will communicate this within a reasonable period of time and taking into account the importance of the investigation. The VanDrie Group will take all reasonable measures to prevent the person to whom a report relates from finding out the identity of the person reporting in another way. The person to whom a report relates is entitled to make an objection to the fact that he/she is the subject of the report that is being investigated.

The VanDrie Group can take disciplinary or legal measures if the VanDrie Group concludes that a report was made in bad faith, for example because false accusations were made knowingly, improperly, maliciously or for personal financial gain, or if the report itself concerns a criminal offence, such as a serious threat. In these cases, authorities may be involved and audio files or IP addresses may be passed on to the independent third party.

## The handling of the report via SpeakUp

Every report that is received via the SpeakUp Line is handled by the SpeakUp Office. Within five working days after receipt of the report, the SpeakUp Office will provide the person reporting with a confirmation of receipt. The SpeakUp Office will carry out an initial assessment, depending on the nature of the report, in order to determine what the suitable expertise, the right team and the appropriate investigation method is to investigate the report. The person reporting may be asked for additional information at that time, either directly if the identity is known, or via the SpeakUp Line if the report is anonymous. The SpeakUp Office will inform the person reporting of the findings of this assessment and explain how the VanDrie Group will deal with the report, how the person reporting will be kept informed and what the expected time frame of the investigation is, the results, any measures and the response thereto. The SpeakUp Office can transfer the report to designated persons within the individual subsidiaries. It may be that due to the need for confidentiality, privacy and other considerations, no specific details may be shared about the investigation and any corrective and disciplinary measures that were taken. Information that is shared with the person reporting must also be treated confidentially by the person reporting. The VanDrie Group cannot guarantee the outcome that may be expected or desired by the person reporting. The VanDrie Group expects, however, that the management at each level, within each subsidiary, treats suspicions of abuses seriously, confidentially and with immediate effect. The management is required to cooperate with the SpeakUp Office and must be helpful.

## Privacy

The VanDrie Group and the designated officials will treat reports that are made in good faith in strict confidence. The information received will only be shared with others within or outside the VanDrie Group if and insofar as this is required in order to be able to handle the report and the issues expressed therein adequately. The privacy policy of the VanDrie Group is applicable to the entire SpeakUp procedure. Sensitive personal data (such as the disclosure of race or ethnic origin, political, religious or philosophical beliefs, membership of a trade union or information about health and sexual orientation) about the person involved will only be processed insofar as processing is permitted in accordance with the national legislation concerning the protection of personal data. Personal data relating to reports that are found to be unfounded will be deleted immediately. Personal data relating to reports about well-founded issues will be deleted within a reasonable period of time after the investigation has been completed (but no later than after four weeks), unless disciplinary measures are taken or legal proceedings are brought against the person involved or someone who made a report in bad faith. In that case, the data will be deleted within a reasonable period of time after the disciplinary measure or the legal proceedings.