

Group Legal & Compliance Speak Up and Whistleblowing Policy

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Policy statement

Ardagh is committed to conducting business in an honest, ethical and professional manner.

Ardagh encourages individuals to speak up if they suspect or become aware of a violation of laws, or a violation of Ardagh's Code of Conduct, in Ardagh's business or in its supply chain. Ardagh has several channels (referred to in this Policy as Ardagh's reporting channels) through which violations or concerns can be raised in a confidential manner, and in some instances anonymously, and with the reassurance that reporters will be protected from retaliation or discrimination.

This Policy outlines the procedures and guidelines for individuals raising concerns through any of Ardagh's reporting channels. This Policy also sets out a clear process for investigating these concerns, to ensure integrity, confidentiality and impartiality in investigations.

For the avoidance of doubt, this Policy also covers any concerns or reports raised with Ardagh that would be protected under national whistleblowing or equivalent laws. Additional information for Ardagh workers in European Union countries is contained in Appendix 1 of this Policy.

Scope

This Policy applies to all directors, officers and employees of Ardagh Group S.A. and each of its subsidiaries (together "Ardagh") and is intended to assist individuals who believe they have discovered:

1. a violation of the Code of Conduct;
2. accounting or auditing malpractices;
3. fraud;
4. failure to comply with Ardagh's policies;
5. failure to comply with any applicable law; or
6. any other improper conduct or unethical behaviour.

This Policy also applies to any third parties, including customers and suppliers, where they raise concerns related to Ardagh or its supply chain (e.g., direct or indirect suppliers). Such concerns include those to violations of laws or regulations, including those related to human rights, health and safety matters, or environmental matters, or any improper conduct or unethical conduct within Ardagh or any party within its supply chain.

Third parties with concerns related to commercial relationships (such as ongoing sales or purchase/supply relationships, delivery issues, product specifications) should raise directly with contacts within Ardagh.

Reporting channels

Employees

A number of reporting channels are available for employees to raise concerns in a confidential and effective manner. In the first instance employees are encouraged to speak to their direct manager. If an employee is uncomfortable speaking with their direct manager for any reason, they may contact Human Resources or Group Legal & Compliance.

To better enable our employees to report concerns, including breaches of Ardagh's Code of Conduct and breaches of laws, Ardagh has implemented the Speak-Up Hotline. The Speak-Up Hotline offers a

secure, confidential and anonymous reporting mechanism.

Reports of concerns may be made verbally or in writing through any of Ardagh's reporting channels.

On request, Ardagh will arrange an in person meeting within a reasonable timeframe, to allow reporters to raise these concerns. Employees may also have the right under national laws to raise certain concerns with external competent authorities.

Third Parties

A number of reporting channels are also available for external third parties to raise concerns in confidential manner. In the first instance third parties are encouraged to speak to their main contact within Ardagh. Alternatively, third parties may contact Ardagh's Group Legal & Compliance department via email at compliance@ardaghgroup.com. Third parties may also raise concerns via Ardagh's Speak-Up Hotline. Certain third parties may also have the right under national laws to raise certain concerns with external competent authorities.

Regardless of the identity of the reporter or the method of reporting, all reports will be considered seriously and investigated.

Ardagh's Speak-Up Hotline

Ardagh's Speak-Up Hotline allows individuals to raise their concerns via telephone or web-reporting, and always in any of the national languages of the countries in which Ardagh operates. Individuals are encouraged to raise such concerns at the earliest opportunity.

In each country where we operate, a toll-free telephone number is set up and operated by Navex (the "Hotline Provider"). The telephone numbers for each country are set out in this Policy and in Ardagh's Code of Conduct.

The web-reporting tool, also operated by the Hotline Provider, is accessible through **ardaghgroup.ethicspoint.com**

In order to comply with the European and national data protection laws of each country, individuals submitting a report through the Speak-Up Hotline will be informed of the reporting scope authorised in the country where he or she is reporting from and whether anonymity is permitted.

Operational concerns

Where an employee identifies day-to-day operational issues or concerns or reasonably and in good faith believes that poor practices exist, they should report this immediately to their direct line manager, plant manager or HR manager. Third parties who identify operational issues should report these to their Ardagh contact, who is best placed to resolve their concerns.

Where an individual does not feel comfortable using these reporting channels for fear of retaliation or believes that their concern has not been adequately addressed, they may contact Group Legal & Compliance or use the Speak-Up Hotline.

Responsibility for the Speak-Up Hotline and Ardagh's Case Management System

Speak-Up Hotline

The overall responsibility for the operation of the Speak-Up Hotline, including the receipt, retention and investigation of Speak-Up Hotline reports, lies within the Compliance Committee. The day-to-day administration of the Speak-Up Hotline is managed by the Group Compliance Director.

Case Management System

Ardagh's Case Management System, provided by the Hotline Provider, is a centralised database to facilitate the management and investigation of concerns. Upon receipt, the Hotline Provider immediately inputs all Speak-Up Hotline reports into the Case Management System.

The Group Compliance Director is responsible for managing the Case Management System and ensuring that reports are allocated for review to an appropriate representative of the Compliance Committee. The Compliance Committee representatives will review and investigate Speak-Up Hotline reports allocated to them, where necessary with the assistance of investigators either within or outside their function.

Where reports subject to this Policy are received directly, including by HR or Group Legal & Compliance, these must be input into the Case Management System, unless subject to restrictions under local law.

Details to provide when raising a concern

When reporting concerns individuals should describe in detail their allegations and provide as much information as possible to allow Ardagh to conduct an investigation.

When using the Speak-Up Hotline telephone tool, an interview specialist will guide the individual through a series of questions depending on the type of issue that will be initially raised. Through the Speak-Up Hotline web-reporting tool, the individual will be guided through several drop-down menus, triggering different series of questions depending on the type of issue.

If reporting anonymously via the Speak-Up Hotline, individuals will be asked to call back or log-in, if using the web-reporting tool, at a specific date within two weeks in order to check the progress of investigation or answer follow-up questions, without revealing their identity.

Investigation process

Ardagh takes every concern seriously. Once a concern is raised, Ardagh will carry out an initial assessment to determine the scope of any investigation required. In some cases, Ardagh may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter. This may include external third parties where necessary. Should an investigation team be appointed, those involved will ensure that its members have the necessary competence.

These investigations will be carried out with the highest degree of integrity, confidentiality and impartiality. All investigations will be conducted in an appropriate and timely manner, and in accordance with any applicable national laws.

Ardagh aims to keep reporters informed of the process of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation.

At all stages of the investigation process, Ardagh will ensure compliance with applicable laws, including data protection laws and whistleblowing laws.

Investigation closing

For each concern raised, the investigator will prepare a closing memo that will include a summary of the facts, findings of the investigation, the corrective actions taken, if any, and a list of recommendations.

The Compliance Committee will meet on a quarterly basis to review reports received and investigation outcomes and will issue a quarterly summary report to the Audit Committee. The Compliance Committee will provide additional information regarding any reports as may be requested by the Audit Committee.

Anonymity and confidentiality

Individuals may report their concerns on an anonymous basis, where permitted under national laws in the country from which the alleged violation is being reported. To support our investigation efforts and in the spirit of open communication, Ardagh encourages individuals to identify themselves.

Ardagh will treat all information provided in concerns raised under this Policy, in a confidential manner and access to such information will be strictly limited to those investigating alleged violations or infringements. The identity of the individual raising a concern (if provided) will be kept confidential so long as it does not hinder or frustrate any follow up investigation.

Ardagh is committed to respecting and complying with applicable data protection laws and whistleblowing laws. In certain instances, in accordance with such laws, Ardagh may need to notify the individuals mentioned in reports.

No retaliation

Ardagh will protect all individuals submitting a report in good faith against any form of retaliation, discrimination or disciplinary action as a result of such disclosure.

Good faith means telling the truth as the individual has good reasons to believe it to be. Ardagh will not tolerate the harassment or victimisation of anyone raising a genuine concern in good faith. Any allegation of retaliation will be investigated promptly, which for employees may result in disciplinary action by Ardagh, up to and including termination of employment.

No misuse

Ardagh will not tolerate the abuse or misuse of its reporting channels, including the Speak-Up Hotline, for other means than the objectives set forth in this Policy. Any such misuse can lead to disciplinary actions for employees, up to and including termination of employment. More specifically, Ardagh will not tolerate the use of reporting channels including for personal defamation and openly wrongful and malicious allegations.

Speak-Up Hotline - reporting options & instructions

Reporting option – Online

To report an issue through the website, please visit: ardaghgroup.ethicspoint.com

Reporting option – Telephone

Reporting hotlines are available in the countries listed in the table below.

You should check whether there are any dialling restrictions for your country. The telephone you are using must have international dialling capability. Dial your country-specific telephone number and, if relevant, access code.

Please note that all of the Telephone Hotlines listed below are available in English.

Country	Languages	Telephone number	Restrictions
Austria	German	0 800 200 288 Access code: 855 344 1555	No restrictions
Brazil	Portuguese	0800 892 0780	No restrictions
Canada	French	855 344 1555	No restrictions
Denmark	Danish	080 25 15 34	No restrictions
Ethiopia	Amharic	800 861 957	No restrictions
France	French	0805 54 29 81	No restrictions
Germany	German	0800 7241915	No restrictions
Ireland	English	1800 456762	No restrictions
Italy	Italian	800 925 014	No restrictions
Luxembourg	English	800 201 11 Access code: 855 344 1555	No restrictions
Kenya	English	0800 221 363	No restrictions
Netherlands	Dutch	0800 440 0006	No restrictions
Nigeria	English	0 708 060 1816 Access code: 855 344 1555	No restrictions
Poland	Polish	800 707 081	Please note that some operators may charge for calls to toll free numbers
Serbia	Serbian	0800 190 669	Serbia ITFS and mobile access are available via Telekom Serbia only
South Africa	English	080 001 0398	No restrictions
Spain	Spanish	900 810 705	No restrictions
Sweden	Swedish	020 10 92 18	No restrictions
Switzerland	German	0 800 890 Access code: 855 344 1555	Available from mobile/cellular phones and charges may apply
United Kingdom	English	0800 587 3808	Also works for Isle of Man and Jersey
USA	English, Spanish	855 344 1555	No restrictions

Appendix 1 – Supplemental European Union Whistleblowers Policy

This Supplemental European Union Whistleblower Policy (hereafter the “Supplemental EU Policy”) applies to all Ardagh entities located within an EU Member State and is provided to comply with the requirements of the EU Whistleblower Protection Directive.

This Supplemental EU Policy must be read together with Ardagh’s Speak Up and Whistleblowing Policy set out above and with the Additional Country Information set out below to ensure compliance with all applicable laws and requirements globally. Where there is a conflict between the Speak Up and Whistleblowing Policy and this Supplemental EU Policy, the provisions of this Supplemental EU Policy will prevail. Where there is a conflict between either the Speak Up and Whistleblowing Policy or this Supplemental EU Policy and the Additional Country Information, the Additional Country Information will prevail.

Scope

The provisions of the Speak Up and Whistleblowing Policy and of this Supplemental EU Policy (together referred to as the “Policy”) will apply to any individual who has the status of worker of any Ardagh entity located in an EU Member State, including an individual retained on a fixed or limited term contract or who is a part-time worker or an agency worker.

It also applies to other individuals who acquire information in a work related context including: job applicants, contractors, sub-contractors, volunteers, paid or unpaid trainees or interns, agency workers where the worker is supplied by a third person to Ardagh, self-employed individuals, shareholders, members of Ardagh’s companies’ administrative, management and supervisory bodies (including non-executive members), anyone working under the supervision and direction of contractors/ subcontractors/suppliers, and anyone in any of the above categories whose work-based relationship with Ardagh is yet to begin or has ended.

Ardagh will ensure that all individuals who fall within the scope of this Supplemental EU Policy are able to view a copy of it and of the Speak Up and Whistleblowing Policy in a format which they can readily understand, particularly catering for those whose first language is not English.

In addition to the matters listed as falling within the scope of the Speak Up and Whistleblowing Policy, individuals covered by this Supplemental EU Policy may report information acquired in a work-related context about an actual or suspected breach of any EU law or regulation or local law related to the following areas of concern:

- a. public procurement;
- b. financial services, products and markets;
- c. prevention of money laundering;
- d. prevention of terrorist financing;
- e. product safety and compliance;

- f. transport safety;
- g. protection of the environment;
- h. radiation protection and nuclear safety;
- i. food and feed safety;
- j. animal health and welfare;
- k. public health;
- l. consumer protection;
- m. protection of privacy and personal data; and
- n. security of network and information systems;
- o. any breaches affecting the financial interests of the EU;
- p. any breaches relating to the EU internal market including breaches of competition and State aid rules and rules on corporate tax including any tax arrangements;
- q. Other serious offences or serious wrongdoings where specified under local law including offences regarding corruption.

Retaliation

The protections against retaliation and discrimination set out in the Speak up and Whistleblowing Policy also apply, where relevant, to:

- facilitators, that is someone who has assisted a reporting person in the reporting process in a work-related context;
- third persons connected with a reporting person and who could suffer retaliation in a work-related context, such as colleagues or relatives; and
- legal entities that a reporting person owns, works for, or is otherwise connected with in a work-related context.

The handling of reports and procedural time frames

Reports will be handled as set out in this Policy.

Where an individual submits a report through any of Ardagh's reporting channels:

- receipt will be acknowledged within seven days; and
- feedback on the report (including information on action envisaged or taken as follow up to the report and the grounds for such follow up) will be provided within a reasonable timeframe which will not exceed three months from acknowledgement of receipt of the report.

Additional reporting options

The Speak Up and Whistleblowing Policy sets out information on how reports can be made, assessment of reports by the Compliance Committee and investigation of reports. Where required, Ardagh may use dedicated investigators to manage a reported concern following a professional, fair and consistent process. This approach guarantees full independence and impartiality in the handling of reports. If an individual does not want their report to be handled in the manner described in the Policy, they may:

- be able to elect for their report to be handled locally instead. This can be done either via the Speak-Up Hotline or by making a report to the individual's local HR team. The designated person for handling such reports shall be the country HR manager or other person designated by Ardagh. Details of the local designated person can be obtained from the local HR team or by contacting: compliance@ardaghgroup.com; or
- report the matter to the competent external authority in the relevant Member State. A list of external reporting authorities relevant to Ardagh can be found in the table below.

Record keeping and Data Protection

Ardagh recognises that it is important, and in everyone's interests, to keep written records during the reporting process.

Ardagh will also ensure compliance with applicable data protection laws. Details of Ardagh's data protection policies and data privacy notices can be found on myArdagh. For further specific local information in relation to data protection in relation to whistleblowing reports, please contact compliance@ardaghgroup.com.

Additional Country Information

The below sets out additional information that Ardagh is legally required to provide under applicable EU whistleblowing laws.

Denmark

Reporting of information which an individual has authorized access to will always be permitted.

Reporting of such information will not be considered a breach of law or an agreement. If an individual is mentioned in a report (i.e. under suspicion), their identity will be protected as part of the handling of the reported concern in the same way as the reporter's identity. In addition, an individual will at any time have the right to defend themselves if a case is filed against them. As such, Ardagh will keep records of all information in the case. In such cases an individual will have the right to request insight, correction, or deletion of their personal data to that extent the rules under GDPR or the data protection law allow.

France

Civil and criminal immunity

To enjoy immunity, a reporter must:

- be a natural person;
- act without financial consideration;
- act in good faith; and
- disclose serious facts.

Reporters enjoy immunity from prosecution provided that the disclosure of information is "necessary and proportionate to safeguard the interests at stake" and is made in accordance with applicable legal procedures (Article 122-9 of the Criminal Code).

Reporters will not be excluded from a recruitment procedure or from access to an internship or training period, be penalised, dismissed or subjected to any direct or indirect discriminatory measure, in particular with regard to remuneration, within the meaning of Article L. 3221-3, profit-sharing measures or the distribution of shares, training, redeployment, assignment, qualification, classification, professional promotion, working hours, performance assessment, transfer or renewal of contract, or any other measure mentioned in II of Article 10-1 of Law 2016-1691 of 9 December 2016 on transparency, combating corruption and modernising economic life, for having reported facts in accordance with this Policy.

Application of the special probationary regime for victims of discrimination

In the event of a dispute arising from a whistleblowing report, a reporter need only to present factual evidence to support the assumption that they have complied with the reporting conditions under this Policy. It is then for the decision maker/Ardagh to justify the decision.

Action before the Labour Court

In the event of termination of an individual's the employment contract as a result of a whistleblowing report (within the meaning of Article 6), the employee may refer the matter to the Labour Court under the conditions provided for in Chapter V of Title V of Book IV of Part One of the Labour Code.

In such cases the individual can ask the judge to award them, at the expense of the other party, an advance in relation to the costs of the proceedings.

In the event of any dispute, the Labour Court may, in addition to any other sanction, require the employer to top up the personal training account of the individual who issued the alert, up to the ceiling mentioned in article L. 6323-11-1 of the Labour Code.

Penalties

Disclosing information that could identify a whistleblower, is punishable by two years' imprisonment and a fine of €60,000, without prejudice to the award of damages. It is also punishable by one year's imprisonment and a fine of €15,000 to obstruct in any way the transmission of an alert.

Germany

An overview of all aspects that are part of the scope for reporting in Germany are listed in the local law, to be found here: [§ 2 HinSchG - Einzelnorm \(gesetze-im-internet.de\)](#)

Italy

Individuals covered by this Policy may **only** report information acquired in a work-related context about an actual or suspected breach of any EU law or regulation related to the areas of concern identified above under "Scope" if they harm the public interest or Ardagh's integrity.

Any dispute, claim or demand related to a personal interest or relating to an individual employment relationship is out of scope of this Policy to the extent permitted by the applicable laws.

Individuals are allowed to submit an external report to the competent authority as envisaged by this Policy in the following cases expressly indicated by the Italian Whistleblowing Decree:

- Ardagh's internal reporting system is not active, available or it does not comply with the requirements provided by the Italian Whistleblowing Decree;
- The reporting person already submitted an internal report that has not been followed up by Ardagh;
- The individual has reasonable grounds to believe that their report will not be effectively followed up by Ardagh or that such report may result in the risk of retaliation; and
- The individual reasonably believes that the breach may cause an imminent or obvious risk for the public interest.

Netherlands

Individuals have the option to consult an advisor in confidence about the suspected wrongdoing. Requests for such consultation should be made to the local country HR manager.

Poland

Reports can be submitted by all persons listed in this Appendix 1, which also includes all persons performing work on a basis other than employment, including a civil law contract, commercial proxies and partners.

Reports concerning labour law will be not recognized under this Policy, however, they will be recognized based on other Ardagh procedures.

Where an individual wishes to make a report to the local HR Team, they may request a face-to-face meeting, which will be arranged within 14 days of receipt of the request for it.

Reports submitted anonymously may not be investigated, particularly if they appear to be clearly

groundless or contain insufficient information for investigation.

Ardagh's Compliance Committee is responsible for taking follow-up actions, including verification of the report and further communication with the reporter, together with requesting additional information and providing feedback to the reporter. Ardagh's Compliance Committee may appoint a local authorized individual to assist with this task as appropriate.

In considering a report, to the extent permitted by law, Ardagh's Compliance Committee may consult or entrust the investigation to external advisors professionally specialized in the relevant area of the alleged breach.

Spain

Individuals covered by this Policy may only report under it information acquired in a professional or work-related context about an actual or suspected breach of any applicable national law which may constitute serious or very serious criminal or administrative offences, as well as about an actual or suspected breach of any other of the provisions set forth in Article 2 of the LPID which are also those identified above under "Scope".

The local reporting channel shall allow for communications to be made in writing or verbally as described above. At the request of the individual, it may also be submitted by means of a face-to-face meeting within a maximum period of seven days.

The timescale for follow up on a report can be extended up to 3 additional months in cases of particular complexity.

Sweden

In addition to reporting information concerning irregularities consisting of any act or omission that violates any EU law or regulation related to the areas mentioned above, an individual who wants to report information under this Policy can only do so if such report concerns irregularities of such gravity that addressing them can be deemed to be of public interest.

It is recommended that the internal reporting channels above are used if the concern can be effectively addressed by Ardagh, and where the individual considers that there is no risk of retaliation (i.e. that the disclosure could have negative consequences).

External Competent Authorities

Country	External Competent Authorities
Austria	Reporting Office "<i>Corruption and Official Offences</i>" of the Federal Office for the Prevention of and Fight against Corruption within the Federal Ministry of the Interior Herrengasse 7 1010 Vienna, Austria + 43 1 53 126-906800 BMI-III-BAK-SPOC@bak.gv.at http://www.bak.gv.at/ Depending on the nature of the concern reports can be made to an institution, body, office or agency of or related to the European Union as well.
Denmark	Whistleblowing concerns can be reported to the Danish Data Protection Agency. The Danish Data Protection Agency is a public authority which operates an external whistleblowing system. The Danish Data Protection Agency's external whistleblowing system: Welcome to the National Whistleblower Scheme
France	Public procurement: • Agence française anticorruption (AFA), or breaches of probity; • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF), for anti-competitive practices; • Autorité de la concurrence, for anti-competitive practices; Financial services, products and markets, prevention of money laundering and prevention of terrorist financing: • Autorité des marchés financiers (AMF), for investment services providers and market infrastructures; • Autorité de contrôle prudentiel et de résolution (ACPR), for credit institutions and insurance undertakings; Product safety and compliance: • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF); • Service central des armes et explosifs (SCAE); Transport safety: • Direction générale de l'aviation civile (DGAC), for air transport safety; • Bureau d'enquêtes sur les accidents de transport terrestre (BEA-TT), for land transport safety (road and rail); • Direction générale des affaires maritimes, de la pêche et de l'aquaculture (DGAMPA), for maritime transport safety; Protection of the environment: • Inspection générale de l'environnement et du développement durable (IGEDD); Radiation protection and nuclear safety: • Autorité de sûreté nucléaire (ASN);

	Food and feed safety: • Conseil général de l'alimentation, de l'agriculture et des espaces ruraux (CGAAER); • Agence nationale chargée de la sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES); Public health: • Agence nationale chargée de la sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES); • Agence nationale de santé publique (Santé publique France, SpF); • Haute Autorité de santé (HAS); • Agence de la biomédecine; • Etablissement français du sang (EFS); • Comité d'indemnisation des victimes des essais nucléaires (CIVEN); • Inspection générale des affaires sociales (IGAS); • Institut national de la santé et de la recherche médicale (INSERM); • Conseil national de l'ordre des médecins, for the practice of the profession of doctor; • Conseil national de l'ordre des masseurs-kinésithérapeutes, for the practice of the profession of masseur-physiotherapist; • Conseil national de l'ordre des sages-femmes, for the practice of the profession of midwife; • Conseil national de l'ordre des pharmaciens, for the practice of the profession of pharmacist; • Conseil national de l'ordre des infirmiers, for the practice of the profession of nurse; • Conseil national de l'ordre des chirurgiens-dentistes, for the practice of the profession of dental surgeon; • Conseil national de l'ordre des pédicures-podologues, for the practice of the profession of chiropodist; • Conseil national de l'ordre des vétérinaires, for the practice of the profession of veterinarian surgeon; Consumer protection: • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF); Protection of privacy and personal data and security of network and information systems: • Commission nationale de l'informatique et des libertés (CNIL); • Agence nationale de la sécurité des systèmes d'information (ANSSI); Any breaches affecting the financial interests of the EU: • Agence française anticorruption (AFA), for breaches of probity; • Direction générale des finances publiques (DGFiP), for VAT frauds; • Direction générale des douanes et droits indirects (DGDDI), for customs, anti-dumping and similar duty fraud; Any breaches relating to the internal market: • Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF), for anti-competitive practices; • Autorité de la concurrence, for anti-competitive practices and state aid; • Direction générale des finances publiques (DGFiP), for corporate tax fraud;
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	Activities carried out by the Ministry of Defense: • Contrôle général des armées (CGA); • Collège des inspecteurs généraux des armées; Public statistics: • Autorité de la statistique publique (ASP); Agriculture: • Conseil général de l'alimentation, de l'agriculture et des espaces ruraux (CGAAER); National education and higher education: • Médiateur de l'éducation nationale et de l'enseignement supérieur; Individual and collective labour relations, working conditions: • Direction générale du travail (DGT); Employment and vocational training: • Délégation générale à l'emploi et à la formation professionnelle (DGEFP); Culture: • Conseil national de l'ordre des architectes, for the practice of the profession of architect; • Conseil des maisons de vente, pour les enchères publiques; Rights and freedoms in relations with State administrations, local authorities, public establishments and bodies entrusted with a public service mission: • Défenseur des droits; High interest and right of children: • Défenseur des droits; Discrimination: • Défenseur des droits; Ethics of persons performing security activities: • Défenseur des droits.
Germany	<i>Bundesamt für Justiz</i> • Phone: 0049 228 99 410 6644 • Website: https://formulare.bfj.bund.de • Post: Bundesamt für Justiz, Externe Meldestelle des Bundes, 53094 Bonn In specific instances: <i>Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)</i> • Phone: 0049 228 4108 2355 • Website: https://www.bafin.de • Post: Bundesanstalt für Finanzdienstleistungsaufsicht, Hinweisgeberstelle, Graurheindorfer Straße 108, 53117 Bonn

	In specific instances: <i>Bundeskartellamt</i> • Phone: 0049 228 9499 5980 • Website: https://www.bundeskartellamt.de • E-Mail: Externe-Meldestelle@bundeskartellamt.bund.de • Post: Bundeskartellamt - Externe Meldestelle - Kaiser-Friedrich-Str. 16, 53113 Bonn
Ireland	Office of the Protected Disclosures Commissioner Address: 6 Earlsfort Terrace, Dublin 2, D02 W773, Ireland Email: General enquiries - info@opdc.ie To report a wrongdoing - disclosures@opdc.ie
Italy	National Anticorruption Authority (Autorità Nazionale Anticorruzione (ANAC) – ANAC Home page - www.anticorruzione.it).
Netherlands	The Dutch Consumer and Market Authority ('<i>de Autoriteit Consument en Markt</i>') The Dutch Financial Markets Authority ('<i>de Autoriteit Financiële Markten</i>') The Dutch Data Protection Authority ('<i>de Autoriteit persoonsgegevens</i>') The Dutch Central Bank ('<i>De Nederlandsche Bank N.V.</i>') The Dutch Whistleblowing House ('<i>het Huis voor Klokkenluiders</i>') The Dutch Healthcare and Youth Inspection ('<i>de Inspectie gezondheidszorg en jeugd</i>') The Dutch Healthcare Authority ('<i>de Nederlandse Zorgautoriteit</i>') The Dutch Nuclear Safety and Radiation Protection Authority ('<i>de Autoriteit Nucleaire Veiligheid en Stralingsbescherming</i>') The Dutch Labour Inspection ('<i>de Nederlandse Arbeidsinspectie</i>') The Dutch Environment and Transport Inspection ('<i>de Inspectie Leefomgeving en Transport</i>')
Spain	The Spanish Whistleblowing Act 2/2023 (hereinafter the "LPID") establishes the creation of an external reporting channel and the appointment of an Independent Whistleblower Protection Authority - Autoridad Independiente de Protección del Informante"). Any natural person may report to this Authority, or to the corresponding regional authorities or bodies, the commission of any actions or omissions included in the scope of application of the LPID, either directly or following communication through the corresponding internal channel. Depending on the nature of the concern the individual may want to make a report to an institution, body, office or agency of the European Union.
Sweden	Work Environment Authority (Sw. <i>Arbetsmiljöverket</i>): https://www.av.se/ • Breaches within the areas of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches that are not covered by any other authority's area of responsibility. • Special supervisory authority.

	The Swedish National Board of Housing, Building and Planning (Sw. <i>Boverket</i>): http://www.boverket.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. Safe and interference-free electricity (Sw. <i>Elsäkerhetsverket</i>): http://www.elsakerhetsverket.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. Swedish Economic Crime Authority (Sw. <i>Ekobrottsmyndigheten</i>): http://www.ekobrottsmyndigheten.se/ • Breaches within the area of financial interests of the EU as set forth in article 2.1 b of the Directive of the European Parliament and of the Council (EU) 2019/1937, as regards the prevention of fraud. The Swedish Estate Agents Inspectorate (Sw. <i>Fastighetsmäklarinspektionen</i>): http://www.fmi.se/ • Breaches within the area of financial services, products and markets and prevention of money laundering and financing of terrorism that are covered by the authority's supervisory responsibilities. Swedish Financial Supervisory Authority (Sw. <i>Finansinspektionen</i>): http://www.finansinspektionen.se/ • Breaches within the area of financial services, products and markets and prevention of money laundering and financing of terrorism that are covered by the authority's supervisory responsibilities. • Breaches within the area of consumer protection that are covered by the authority's supervisory responsibilities. • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities. The Public Health Agency of Sweden (Sw. <i>Folkhälsomyndigheten</i>): http://www.folkhalsomyndigheten.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of public health that are covered by the authority's supervisory responsibilities. Swedish Agency for Marine and Water Management (Sw. <i>Havs- och vattenmyndigheten</i>): http://www.havochvatten.se/ • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. Swedish Authority for Privacy Protection (Sw. <i>Integritetsskyddsmyndigheten</i>): http://www.imy.se/ • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities. Inspectorate of Strategic Products (Sw. <i>Inspektionen för strategiska produkter</i>): http://www.isp.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. Health and Social Care Inspectorate (Sw. <i>Inspektionen för vård och omsorg</i>): http://www.ivo.se/
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	• Breaches within the area of public health and that are covered by the authority's supervisory responsibilities. • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities. The Swedish Chemicals Agency (Sw. Kemikalieinspektionen): http://www.kemi.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. The Swedish Consumer Agency (Sw. Konsumentverket): http://www.konsumentverket.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of public health and that are covered by the authority's supervisory responsibilities. • Breaches within the area of consumer protection that are covered by the authority's supervisory responsibilities. The Swedish Competition Agency (Sw. Konkurrentverket): http://www.konkurrentverket.se/ • Breaches within the area of public procurement that are covered by the authority's supervisory responsibilities. • Breaches within the area of internal market as set forth in article 2.1 c of the Directive of the European Parliament and of the Council (EU) 2019/1937, as regards the area of competition. The Swedish Food Agency (Sw. Livsmedelsverket): http://www.livsmedelsverket.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. • Breaches within the area of radiation protection and nuclear safety that are covered by the authority's supervisory responsibilities. • Breaches within the area of food and feed safety and the safety and wellbeing of animals that are covered by the authority's supervisory responsibilities. • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities. Swedish Medical Products Agency (Sw. Läkemedelsverket): http://www.lakemedelsverket.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of public health and that are covered by the authority's supervisory responsibilities. Relevant County Administrative Board: www.lansstyrelsen.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. Additionally, County Administrative Boards of Södermanland County, Västra Götaland and Skåne County have the following areas of responsibility.
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	• Breaches within the area of financial services, products and markets and prevention of money laundering and financing of terrorism that are covered by the authority's supervisory responsibilities. • See web link above. Swedish Civil Contingencies Agency (Sw. <i>Myndigheten för samhällsskydd och beredskap</i>): https://www.msb.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. The Swedish Environmental Protection Agency (Sw. <i>Naturvårdsverket</i>): http://www.naturvardsverket.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. The Swedish Post and Telecom Authority (Sw. <i>Post- och telestyrelsen</i>): http://www.pts.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities. The Government Office (Sw. <i>Regeringskansliet</i>): https://www.regeringen.se/ • Breaches within the area of financial interests of the EU as set forth in article 2.1 b of the Directive of the European Parliament and of the Council (EU) 2019/1937, as regards the area of state aid. • Breaches within the area of the internal market as set forth in article 2.1 c of the Directive of the European Parliament and of the Council (EU) 2019/1937, as regards the area of state aid. Swedish Inspectorate of Auditors (Sw. <i>Revisorsinspektionen</i>): http://www.revisorsinspektionen.se/ • Breaches within the area of financial services, products and markets and prevention of money laundering and financing of terrorism that are covered by the authority's supervisory responsibilities. The Swedish Tax Agency (Sw. <i>Skatteverket</i>): http://www.skatteverket.se/ • Breaches within the area of financial interests of the EU as set forth in article 2.1 b of the Directive of the European Parliament and of the Council (EU) 2019/1937, as regards the area of taxation. • Breaches within the area of the internal market as set forth in article 2.1 c of the Directive of the European Parliament and of the Council (EU) 2019/1937, as regards the area of corporate taxation. The Swedish Forest Agency (Sw. <i>Skogsstyrelsen</i>): http://www.skogsstyrelsen.se/ • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. The Swedish Gambling Authority (Sw. <i>Spelinspektionen</i>): http://www.spelinspektionen.se/ • Breaches within the area of financial services, products and markets and prevention of money laundering and financing of terrorism that are covered by the authority's supervisory responsibilities.
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	The Swedish Energy Agency (Sw. <i>Statens energimyndighet</i>): http://www.energimyndigheten.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities. The Swedish Board of Agriculture (Sw. <i>Statens jordbruksverk</i>): http://www.jordbruksverket.se/ • Breaches within the area of environmental protection that are covered by the authority's supervisory responsibilities. • Breaches within the area of food and feed safety and the safety and wellbeing of animals that are covered by the authority's supervisory responsibilities. • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. Swedish Board for Accreditation and Cormity Assessment (Sw. <i>Styrelsen för ackreditering och teknisk kontroll</i>): http://www.swedac.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. Swedish Radiation Safety Authority (Sw. <i>Strålsäkerhetsmyndigheten</i>): http://www.stralsakerhetsmyndigheten.se/ • Breaches within the area of radiation protection and nuclear safety that are covered by the authority's supervisory responsibilities. The Swedish Transport Agency (Sw. <i>Transportstyrelsen</i>): http://www.transportstyrelsen.se/ • Breaches within the area of product safety and product compliance that are covered by the authority's supervisory responsibilities. • Breaches within the area of transport safety that are covered by the authority's supervisory responsibilities. • Breaches within the area of protection of privacy and personal data as well as security of network and information systems that are covered by the authority's supervisory responsibilities.
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Revision Log

Rev #	Type	Date	Author	What was changed
1.0	New standalone Speak Up and Whistleblowing Policy	March 2024	Julia Joseph	Creation of new standalone Speak Up and Whistleblowing Policy (reflecting content of Compliance Hotline Policy previously appended to the Code of Conduct).
1.1	Minor updates	August 2024	Kiran Dhupar	Addition of new section in Appendix 1 - Supplemental European Union Whistleblowers Policy in relation to Poland, to ensure compliance with the local whistleblowing laws in Poland.
2.0	New version	August 2025	Julia Joseph	Addition of reference to application of the Speak Up and Whistleblowing to third parties.

