

# Valeo Foods Group - Whistleblowing Policy

## Introduction

Valeo Foods Group (and its subsidiaries) aims to conduct its business in the best way possible, compliant with local legislation and ensuring compliance across the group in line with group policies and procedures. This policy (“Whistleblowing Policy” or “Policy”) is developed to ensure Valeo Foods Group Personnel that it is safe and acceptable to speak up and to enable them to raise any concerns they may have about malpractice at an early stage and in the right way. Rather than wait for proof, we encourage our Personnel to raise the matter when it is still a concern.

This policy applies to all those who work for us, whether full-time or part-time, or employed through an agency.

## Scope & Governance

In accordance with this commitment, Valeo Foods Group has adopted this Policy, which is applicable to all Valeo Foods Group Personnel, agents, representatives and other associated persons such as contract/ subcontract and third-party employees of Valeo Foods Group including all subsidiaries, associates, joint ventures and affiliated companies (collectively, the “Valeo Foods Group” or the “Group”).

This Policy and the internal controls herein have been designed to allow all personnel to make a complaint freely and without fear of any reprisals, and to enable Valeo Foods Group to respond promptly and effectively to any inquiries about its conduct.

This policy has been approved by Valeo Foods Group’s executive management and approved by the Board of Directors. Any internal concerns or questions should be raised at a local level, in accordance with the relevant business procedure.

In addition, the policy is reviewed and monitored by the GCPO (Group Chief People Officer) who has responsibility for the supervision and implementation of this policy. This policy is reviewed bi-annually and if any amendments are needed this will be actioned to comply fully with reporting and governance requirements in the jurisdictions in which we operate.

## Our Commitment

Valeo Foods Group is committed to the physical safety and emotional wellbeing of all its personnel and will always seek to redress any allegations of wrongdoing by any of its personnel or working partners.

The policy plays a vital role in upholding the group's principles and ensuring legal compliance. By bringing potential wrongdoing to light, it fosters a culture of honesty and accountability within the group. This allows for early intervention in case of misconduct, safeguarding the group's reputation to reduce any damage that may otherwise occur.

Moreover, this policy goes beyond addressing immediate concerns. By encouraging whistleblowing, we can uncover weaknesses within our systems themselves. This valuable insight allows us to revise and strengthen those systems, preventing future issues and enhancing overall compliance.

Ultimately, this creates a supportive environment where anyone seeking guidance, raising a genuine concern, or reporting a suspected breach feels empowered to come forward.

If any personnel raise a genuine concern under this policy, he/she/they will not be at risk of losing their job or suffering any form of retribution as a result. We will not tolerate the harassment or victimisation of anyone that raises a concern. Providing it is being acted out in good faith. This assurance is not extended to any personnel who maliciously raises a matter they know to be untrue.

## **Specific Policy Points**

### **Customer requirements**

The safety and wellbeing of all Valeo Foods personnel is the priority of Valeo Foods Group and therefore business policies and protections will apply over and above any customer or supplier requirement.

Should a customer require a local business to adopt their whistleblowing policies or reporting requirements, these must be agreed to by a local business MD and must be followed in addition to this policy. In this instance any involved personnel must be informed of this requirement and received the appropriate training.

### **Internal Reporting**

Any concerns are encouraged to be addressed openly and informally in the first instance, and in keeping with local business procedures. First point of contact should be the direct line-manager or when preferred the local divisional HR lead.

- Any grievances raised will be treated as private and confidential, wherever possible. Identity of any personnel will not be disclosed without prior authorisation of the individual.
- Once raised a grievance will be assessed at a local business level and their process for investigation should be followed.
- Personnel has the right to be informed how the process will be managed and by whom, as well as to be informed in a timely fashion of the final decision.
- In the event the local business procedure has not been satisfactorily concluded the appeal process should be followed. The divisional Head of HR or Managing Director should be contacted in the event an alleged breach is so serious the above process cannot be followed.
- Identities of any personnel involved will be kept private and confidential where possible, disclosure of any witness identities will be agreed in advance with the individual.

However, it is recognised that there may be circumstances when this may not be possible. For this, Valeo Foods Group has contracted an external whistle-blowing helpline, available to all Personnel anywhere in the Group. The independent whistle blowing helpline can be called to maintain anonymity if it is not appropriate to report the matter internally. The whistle-blowing helpline is private and confidential and can be reached at any time of the day or night via [www.safecall.co.uk](http://www.safecall.co.uk), via which local contact details and local language reporting options are available. Any reported matters to the whistleblowing helpline will be following similar principles as above.

### **Compliance Procedures and Training**

Valeo Foods Group takes its commitment to whistle-blowing compliance very seriously and operates a zero-tolerance approach. Any Group personnel who have knowledge of, or reason to suspect, any violation of this Policy should follow local business reporting procedure or contact the Group Chief People Officer.

All personnel are responsible for adherence to this Policy and should be aware of their personal responsibility to each other, customers, contractors, suppliers and visitors.

Valeo Foods Group has established a system of targets that monitors the type of issues relating to the following areas:

1. Financial Services: It can help uncover corruption, money laundering, terrorist financing, or market manipulation within financial institutions.
2. Product Safety: Whistleblowers can identify safety hazards in products before they reach consumers.
3. Transport Safety: Reporting concerns can prevent accidents and ensure safe transportation practices.
4. Protection of the Environment: Whistleblowing can expose pollution, illegal waste disposal, or other environmental threats.
5. Consumer Protection: can expose misleading advertising, unfair business practices, or defective products that harm consumers.
6. Privacy and Data Security: It can reveal breaches of personal data, misuse of customer information, or inadequate cybersecurity measures.
7. Child and/or forced labour: Whistleblowing can help prevent any cases adhering to our zero-tolerance commitment.
8. Discrimination & harassment: Helps to expose any issues to ensure that all employees are working in an inclusive safe workplace.

As part of Valeo Foods Group's ongoing commitment to a speak up culture, all Valeo Foods Group Personnel must receive, understand and confirm their agreed compliance with this Policy.

Valeo Foods Group will offer local business periodic whistle-blowing training programs to educate all personnel about the requirements and obligations of this Policy. All Valeo Foods Group Personnel must participate in such training and the local records must be kept as evidence establishing compliance with this requirement.

Valeo Foods Group will ensure awareness and visibility of the whistleblowing helpline across all divisions of the Group so that in any such situation needed personnel is able to contact and report.

Any questions regarding this Policy can be addressed to the local division lead or the Group Chief People Officer.

*Last Updated: June 2024*

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