



## Whistleblowing Policy

# Whistleblowing within Lotus Bakeries

## 1 – What is Whistleblowing and why is it important?

Lotus Bakeries is committed to act with integrity, honesty, fairness and in full compliance with applicable laws, rules and regulations at all times and in an ethical manner. Trust in our company and brands makes consumers want to buy our products, retailers to list our products, (co-) manufacturers to produce our products, investors to value our stock and talented people to join our Lotus community.

We have implemented a Code of Conduct explaining our expectations, to ensure that employees and business partners across Lotus Bakeries have a clear understanding of the principles and ethical values that we want to uphold.

Despite our commitments on ethical behaviour, you may observe conduct that concerns you, or that seems to violate Lotus Bakeries Code of Conduct, our policies or applicable laws and regulations. If you observe or suspect misconduct, we would ask you to speak up.

By speaking up, you give Lotus Bakeries the opportunity to review and act on the issue. We believe that speaking up is key to sustaining our reputation, success and license to operate. We greatly value the help of employees and others who identify and speak up about potential concerns that need to be addressed. People who speak up are protected and will not suffer for raising concerns in good faith about suspected misconduct. Lotus Bakeries will not tolerate any form of retaliation against you for speaking up.

This document explains how you can raise concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what you can expect from us concerning follow up and relevant action.

## 2 - Who can raise a concern under this Policy?

Everybody is invited to speak up, both employees and external parties. Our Whistleblowing system is available to anyone who wishes to raise a concern about possible misconduct within Lotus Bakeries.

We trust that all concerns will be raised in good faith. Any reporter who has not acted in good faith by reporting an alleged concern or who doesn't respect the confidentiality provisions in this policy, may lose the rights and protection provide for in this policy.

We ask for consumers to address all product related questions and concerns to our dedicated customer services (information you can find on the relevant packaging and/or the product websites).

## 3 – Scope of the policy

Our Whistleblowing system can be used to raise concerns about any suspected violation of our Code of Conduct, our policies or applicable laws and regulations.

Example of topics you can raise concerns about are: (1)Accounting/Audit concerns (2) Antitrust or Fair Trading (3) Conflict of interest (4) Consumer Protection (5) Copyright or Trademark infringement (6) Corruption or Bribery (7) Disclosure or misappropriation of confidential information (8) Discrimination

(9) Environmental issues (10) Fraud (11) Harassment (12) Insider Trading (13) Protection of Privacy and Personal Data, and Security of Network and Information Systems (14) Quality Concerns (15) Retaliation (16) Unsafe working conditions and (17) vendor concerns.

Reports can relate to breaches that have already occurred and breaches which are imminent or anticipated.

#### 4 - How to report misconduct?

### **Variety of channels available!**

There are different mechanisms in place within Lotus Bakeries to report misconduct. Up to you to decide which channel is the best fit for you in your case:

- In case of immediate threat to life or property, if you need emergency assistance, please contact the relevant local authorities and/or your local health & safety representative;
- If you have personal work related concerns, such as dissatisfaction with wages, shifts, interpersonal issues or performance evaluations: please contact your line manager, HR person, the dedicated trust persons which are available or consult your employee handbook or local grievance procedure;
- For complaints as a consumer please contact our consumer service (information you can find on the relevant packaging and/or the dedicated productwebsites).
- If you suspect misconduct, you are encouraged to address this directly with the person involved or to raise your concerns with your line manager. You can also reach out to an HR/legal representative or to the managing director of your area. These representatives will inform the right department in Lotus Bakeries that a concern has been raised for review and follow-up in accordance with our relevant procedures.
- You can also use our web-based reporting system (organized via the independent party convercent by OneTrust) to raise concerns confidentially or anonymously and in your own language available on <https://www.lotusbakeries.com/governance-practices-and-policies>.

### **Web-based reporting system**

If you use the Lotus Bakeries Whistleblowing system, you will be given a confidential issue number and asked to provide a personal password and security question. The access number and password allow you to check the status of the report on the externally hosted platform, as well as communicate with the person handling your concern.

If you provided an email address, you will also receive email notifications from the system when the status of your report is updated. All reports received via this externally hosted whistleblowing system are routed back to Lotus Bakeries for further handling.

If you have decided to report anonymously, Lotus Bakeries will not be provided with your personal details.

When filing a report, we encourage you to provide as much relevant information as possible. Detailed information enables us to assess and investigate concerns more thoroughly and to act where necessary. This includes:

- A description of the situation that has caused your concern, as well as the history of the misconduct and examples of events.
- Names of people potentially involved, dates, places and other relevant information. Cases will be assigned to a case handler (as explained below) however people mentioned in your report will never be assigned the case or gain access to that case.
- Any supporting evidence and documents related to your report.

A concern raised can only be followed up if it contains enough information and there is a reasonable possibility of obtaining further information, where required. Even if you do not have all the facts, we encourage you to speak up as soon as possible and to share the facts that you do have. We do not expect you to have all the answers, and you are not expected to prove that the concern is well founded. Lotus Bakeries will investigate the matter to determine whether there is a genuine reason for concern.

## **Confidentiality and non-retaliation**

### 1- Will the report remain confidential?

All reporting is done confidentially. During and after investigations, Lotus Bakeries always keeps details of the whistleblowing reports confidential, including the identities of the reporter and anyone mentioned in the report. We share the information with a limited number of people on a strictly need-to-know basis and only disclose it outside this small group if we are required to do so by law or if an important public interest is at stake. You can help us protect confidentiality by being discreet and not discussing your filed report with your colleagues or anyone else.

You can share your concerns anonymously via our web-based tool. However, we do recommend that you reveal your identity, as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously.

### 2- Non retaliation

If you have submitted a report in good faith, you will never be subject to any sort of (threats or attempts to) retaliation measure which causes or may cause unjustified detriment to you because of the report. Lotus Bakeries prohibits retaliation against employees who speak up in good faith or cooperate in investigations. Any form of threat or retaliation will not be tolerated and may lead to disciplinary measures.

### 3- Privacy

Lotus Bakeries is committed to protecting the privacy of everyone involved. We will do everything to safeguard personal data from unauthorised access and processing. Any personal data obtained in relation to this policy will be used for the purposes explained in this document only or to comply with the law or an important public interest.

Reports are securely stored on a dedicated platform. All reports are deleted and retained according to retention and deletion rules and based on a case-by-case assessment.

For more information on how your personal data is treated please read our [privacy policy](http://www.lotusbakeries.com/privacy-policy) on [www.lotusbakeries.com](http://www.lotusbakeries.com).

## What happens after you speak up?

### 1. Life cycle of the case

We take every report of potential misconduct seriously. We investigate every case in accordance with our set standards to ensure the right quality and speed of response. If you submit a report, you will receive a confirmation within seven days. Your report will undergo a preliminary review in which we might contact you for additional information. If necessary, the preliminary review will be followed by an investigation. On average, closure of the matter can be expected within one to three months. We strive to close as soon as possible. You will be informed of the outcome of a preliminary review or investigation, i.e. whether we have established that misconduct has taken place, once the review is complete. We will not be able to provide full details of the outcome of a matter or related disciplinary actions taken for reasons of confidentiality, privacy, and the legal rights of all concerned.

### 2. Who treats your concern?

Your report will be logged in a case management system (CMS). Depending on (1) your location, (2) the nature of the concern and (3) the Parties involved, the case will be handled by either the local HR responsables or in case of specific concerns for which the knowledge is mostly available on group level, by the central team specialized in that topic.

Each reported concern starts with a preliminary review, where the concern is analysed to determine if it requires further review and investigation. If the concern raised requires further review, we will assign it to the right internal expert. If needed, outside experts, such as lawyers, auditors, or accountants, may be engaged to assist in a review. These third parties work under strict confidentiality.

Our preliminary reviews and investigations are conducted in an independent, fair, and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles. This includes a fair hearing. In principle, we inform any implicated person that a complaint has been filed against him/her.

### 3. Involved in an investigation?

If you become involved in an investigation, whether as a reporter, a witness, or a subject, you must cooperate and answer all legitimate questions completely and honestly. Deliberately withholding information or misinforming the people performing the investigation may result in disciplinary measures being taken, as will delaying, or obstructing the investigation. All parties involved in an investigation, including the subject, are entitled to confidentiality to avoid unnecessary damage to their reputation. If you participate in or learn about an investigation, you must therefore keep the matter strictly confidential.

## Questions?

For more information or questions, please contact your manager, HR or Legal & Compliance (directly or via e-mail [corporate@lotusbakeries.com](mailto:corporate@lotusbakeries.com) ). If you believe that your concern or a concern raised against you has not been reviewed or handled properly, please inform immediately report this via [corporate@lotusbakeries.com](mailto:corporate@lotusbakeries.com).