

UCC EUROPE WHISTLEBLOWING POLICY EXTERNAL

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1. Introduction

UCC Europe Ltd and its trading subsidiaries (together, 'UCCE Group') are committed to the highest standards of integrity, honesty, and ethical conduct in all our business dealings.

To support this commitment, we provide a confidential whistleblowing service available to all external stakeholders including customers, suppliers, contractors, and business partners.

2. What to Report

We would encourage you to raise any concerns relating to suspected breaches of law or ethics relating to, or in connection with, UCCE Group. This covers the reporting of an actual or suspected Breach including but not limited to the following areas:

- 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;
- n) security of network and information systems;
- o) Breaches affecting the financial interests of the EU;
- p) Breaches relating to the EU internal market, including Breaches of:
 - i. competition and state aid rules;
 - ii. rules on corporate tax, including any tax arrangements;
- q) allegations of potential violation of Group policy or procedure;
- r) any misconduct, such as violations of local laws or regulations that could potentially give rise to criminal or regulatory liability for the Group or its employees, including but not limited to:
 - i. allegations of anti-corruption and sanctions;
 - ii. accounting irregularities;
 - iii. fraud;
 - iv. conflicts of interest; and
 - v. misappropriation of assets.

You are encouraged to report any Breach which you reasonably believe is unlawful and is causing you concern. Your report can relate to any Breach anywhere in the world; it is not restricted to matters purely arising in the country where you work.

A **Whistleblower** is a person who raises a genuine concern in good faith relating to any of the above.

Please note: This service is **not** for customer complaints about products or services. Such issues should be raised through our customer service channels.

3. How to Report

You can raise concerns in confidence by contacting the dedicated UCCE Group whistleblowing email address:

whistleblowing@ucc-europe.co.uk

Reports can be made anonymously if you wish. All reports will be handled confidentially and reviewed by our Group Compliance team.

Our Group Compliance team will be responsible for:

- i. acknowledging receipt of your report within seven days;
- ii. maintaining communication with you, including asking for further information on the report where necessary;
- iii. ensuring your report is diligently followed up/investigated to assess the accuracy of the allegations made in the report;
- iv. ensuring a decision is made on any action required to address the Breach reported or deciding to close the procedure;
- v. providing feedback to you on your report, including information on action envisaged or taken as follow-up to the report and the grounds for such follow-up. Feedback will be provided within a reasonable timeframe, which will not exceed three months from acknowledgement of receipt of your report.

4. Confidentiality and Protection

All concerns will be treated seriously and investigated appropriately.

All reported information, including the identity of the person making the report, is treated as confidential, subject to applicable legal and regulatory requirements.

Any individual who makes a report to UCCE Group directly is protected from unlawful retaliation and discrimination if they make a report and have reasonable grounds to believe the information in the report is true.

Personal data collected under this process will be processed and retained in accordance with applicable local data protection laws, including UK GDPR and EU GDPR, and will be limited to what is necessary for the purposes of investigating the concern.

5. Our Commitment

UCC takes whistleblowing reports extremely seriously. All concerns raised to UCCE Group directly will be reviewed and investigated discretely and effectively by our Group Compliance team in line with our Whistleblowing Policy and Procedure with advice from legal counsel.

By providing this channel, we aim to ensure that we can provide an open and transparent line of communication with UCCE Group which enables any concerns to be addressed fairly, appropriately, professionally, and without retaliation to those who raise them.



Every coffee,
every moment