



UNITED PETFOOD

Anti-Corruption & Anti-Bribery policy

Version 2

Approved by the board of directors: 30 08 2024





Whistleblowing policy

A managed whistleblowing process is key to maintaining good business ethics

1. Scope of application

This Whistleblowing policy applies to and will be adhered to by United Petfood Group BV and each and every subsidiary company of United Petfood Group BV (hereinafter 'United Petfood').

2. Introduction

United petfood requires directors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, including compliance with all applicable laws and regulations. This policy allows for directors, employees, agency staff and third parties (e.g. clients, suppliers, 'sub) contractors) to confidentially report illegal or unethical behaviour by directors, employees or agency staff in a responsible and effective manner.

Reports may be made of violations or suspected violations and could include:

- Criminal activity;
- Financial malpractice or impropriety or fraud;
- Failure to comply with the law;
- Danger to health, safety or the environment;
- A violation of rules of conduct in force;
- Improper conduct or unethical behaviour;
- Attempts to conceal any of the above;

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. United Petfood will take any concerns that you may raise relating to the above matters very seriously.

This policy does not form part of your contract of employment and it may be amended at any time. United Petfood may also vary this policy, including any time limits, as appropriate in any case.



3. No Reprisals

No person who reports a violation or suspected violation in good faith shall suffer harassment, reprisal or any adverse employment consequence where the individual reasonably believes their disclosure to be in the public interest.

Any person who retaliates against someone who has made a report which they believe to be in the public interest may be subject to the Disciplinary Procedure up to and including dismissal.

4. Reporting Violations

Whistleblowing reports should be submitted to the HR Manager and should state that the report is being made under the Whistleblowing Policy.

Reports and subsequent investigations reports will be treated in an utmost confidential and sensitive manner as far as possible, consistent with the need to conduct an adequate investigation. Information is disclosed to employees or third parties on a strict "need to know" basis for the purpose of the investigations. Reports may be submitted anonymously, although to do so makes the report less credible and may hinder an investigation. Anonymous reports will be reviewed by the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources. Anyone filing a report must believe the disclosure to be in the public interest. Any allegations that prove not to be substantiated and which prove to have been made maliciously or are knowingly false will be viewed as a serious disciplinary offence and, where appropriate, the police will be informed.

5. Investigation

The Group HR Manager is responsible for investigating and resolving all reported complaints concerning violations. He/she may delegate the investigation. If necessary external resources may be used for the investigation (e.g. financial auditors). If there is evidence of criminal activity, then Group HR Manager will inform the Managing Director and the police.

The investigating officer will inform the member of staff against whom the report is made as soon as is practically possible. The member of staff will be informed of their right to defend themselves and be accompanied by a trade union representative or work colleague at any hearing held under these procedures. For the avoidance of doubt employees do not normally have the right to bring a companion to an investigative interview. However, we may allow you to bring a



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companion if it helps you to overcome any disability or any difficulty in understanding English or any language in which the procedure is held.

Any disciplinary action will be taken under the Disciplinary Procedure. Should the Group HR Manager be the subject of the complaint, the investigating officer will notify the Managing Director who will decide how to manage the investigation.

All reported concerns will be dealt with as soon as reasonably practicable, taking into account the complexity and the nature of the issue.

All employees involved in the Disciplinary Procedure will maintain strict secrecy of the content of reports in accordance with applicable law.

6. Feedback

In case the identity of the reporter is known, United Petfood will aim to keep the person who reported the concern informed of the progress of the investigation, whether corrective action or process improvements were recommended, whether further action will be taken and its likely timescale. However, sometimes the need for confidentiality may prevent United Petfood giving specific details of the investigation or any disciplinary action taken as a result. Furthermore, no details are released about specific individuals and feedback may be general in nature, taking into account the need to conduct further investigations and the rights of third parties.

7. Document retention

The HR Manager will maintain a record of all reports, investigations and resolutions. Investigation reports and supporting information are retained for a minimum period of 5 years following the closing of the investigation, unless otherwise required by local law.

8. Personal data

The reporting and subsequent investigation might involve the processing of personal data of employees, third parties, or anyone other involved. Such personal data shall be processed in accordance with the EU General Data Protection Regulations, the United Petfood Data Privacy and Security policy and data protection procedure or any other applicable (local) privacy regulation.

Personal data is collected only to the extent necessary to conduct required investigations and is disclosed only to persons involved in the investigation and decision-making process, including in certain cases external service providers.



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Employees, third parties or everybody involved in the Disciplinary Procedure whose data is retained shall have the right to inspect, access, correct such data, ask for the erasure of it or object against to the processing of such data. The person involved may exercise such rights in conformance with Company's Privacy Policy in place by sending an email to info.privacy@unitedpetfood.eu.

9. General

The General Manager is responsible for implementing and monitoring this Whistleblowing Policy at the relevant subsidiary under its supervision. This includes ensuring that all operations/activities align with the Policy's objectives and that employees comply with its guidelines. Severe violations of the Whistleblowing should be reported to Group Management, and if necessary, to the Board of Directors.

10. General

This policy takes effect on September 1st, 2024 and replaces all previous Whistleblowing policies at group level.

Where a local Whistleblowing policy is implemented at the relevant subsidiary, or local standards, law and regulations differ from this Policy, the most stringent rules shall apply.

United Petfood reserves the right to amend this policy at any time.