



 JDE Peet's

JDE PEET'S

SPEAK UP POLICY

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DISCIPLINE

SIMPLICITY

ACCOUNTABILITY

SOLIDARITY

ENTREPRENEURSHIP

1. INTRODUCTION

We can only grow and improve as an organisation if we are open and honest with one another. Therefore, JDE Peet's encourages a speak up culture to report any actual or suspected misconduct, be it a violation of our Codes, Policies, our Values or the law that applies to us. We foster an open dialogue with our employees, customers, business partners, suppliers, investors and other stakeholders, and do not tolerate any form of retaliation against those who voice their concerns truthfully and accurately.

PURPOSE

The purpose of this policy is to explain how you can raise concerns about suspected misconduct and to inform you about JDE Peet's' ways of working when you speak up.

WHO CAN SPEAK UP?

This JDE Peet's Speak Up Policy is available to anyone who wishes to raise a concern about possible misconduct within JDE Peet's or its subsidiaries (the "Company"), regardless of where they are located. This includes, for example, employees, persons working for or on behalf of JDE Peet's, workers throughout the supply chain, business partners and other stakeholders such as (representatives of) affected communities or consumers.

WHY SHOULD I RAISE A CONCERN?

As a Company we want to live up to our commitment to act with integrity. To do so efficiently, we need your support by speaking up whenever you learn about or suspect potential misconduct. Remaining silent about possible misconduct may worsen a situation and undermine trust. By raising your concern, you give the Company the opportunity to address potential issues and foster a culture of transparency and integrity. Thereby we also further help to protect our Company and its stakeholders.

WHAT IS THE COMPANY'S POLICY ON RETALIATION?

When you speak up and raise concerns truthfully and accurately, you are doing the right thing and the Company will not tolerate any retaliation against you. If you know of, or in good faith suspect that, an act of retaliation has occurred against you, a colleague, or any other reporter, we advise you to report it to your manager or contact the speak up channels as soon as possible.

The Company does not tolerate any form of threat, (attempt of) retaliation or other action against any other person or entity who has made or assisted in the making of a report of potential misconduct. If the Company learns of any such threat, (attempt of) retaliation or other action, it will take appropriate measures which may include termination of employment.

2. SPEAK UP POLICY

ABOUT WHICH CONCERNS SHOULD YOU SPEAK UP?

The JDE Peet's Speak Up policy can be used to raise concerns about suspected misconduct within the Company or throughout its supply chain. Such suspected misconduct may include a violation of applicable (international) law, a violation of the JDE Peet's Codes of Conduct, its policies, standards and/or procedures under which it operates¹.

Examples of a misconduct which can be reported include:

- ✔ Fraud
- ✔ Inadequate financial or non-financial reporting and record keeping
- ✔ Improper use of the Company's resources
- ✔ Embezzlement, theft
- ✔ Insider trading
- ✔ Conflicts of interest
- ✔ Human rights violations, such as but not limited to excessive working hours, child labour, or any individual working under exploitation or coercion
- ✔ Violations of anti-trust or competition laws
- ✔ Money laundering
- ✔ Violations of sanctions, export controls and trade laws
- ✔ Bribery and corruption
- ✔ Safety, health and environmental matters
- ✔ Bullying
- ✔ Violations of privacy and data protection laws
- ✔ Disclosure of confidential information or trade secrets
- ✔ Retaliation against a person reporting in good faith
- ✔ Violations of any of our (other) policies

Do not use this Speak Up Policy for the following matters:

- ✘ As emergency line for situations presenting an immediate threat to life and limb, assets or property. If you need emergency assistance, call an emergency phone number and/or the local authorities.
- ✘ For any questions you may have in relation to your terms of employment (for example benefits or promotion)
- ✘ To settle personal matters or legal disputes
- ✘ To make accusations which are not truthful or which are not made in good faith. Concerns or allegations raised maliciously or in bad faith (e.g., knowing they are not true) will not be tolerated and reporters who make them, are subject to disciplinary action, which may include termination of employment

¹ This Policy is intended, among other things, to satisfy the Company's obligations under the applicable European Union (EU) legislation. To the extent that applicable laws or regulations in respect of the treatment of information received by the Company in connection with a speak up report or an investigation (if initiated), are inconsistent with this Policy, the Company will comply with such applicable laws or regulations.



WHAT DOES THE COMPANY EXPECT OF ME?

In addition to knowing the compliance and integrity responsibilities that apply to your job, we expect you to promptly speak up if you believe that someone acting for or on behalf of the Company (including yourself) has done, is doing, or may be about to do something that would be considered misconduct.

This basic expectation applies to everyone who works for the Company or on behalf of the Company, anywhere in the world and throughout its supply chain. No matter where you work and no matter your job or salary grade, if you learn of potential misconduct, the Company expects you to speak up.

HOW DO I RAISE A CONCERN, WHOM SHOULD I CONTACT?

You can speak up through different channels.

EMPLOYEES

If you are an employee, you can report suspected misconduct:

- to your Manager;
- in case suspected misconduct relates to your Manager or you do not feel comfortable reporting it to your Manager, contact your local compliance officer or your HR contact person;
- to the central Compliance team in Amsterdam, the Netherlands, by sending an email or letter (to JDE Peet's, Global Compliance Officer, Oosterdoksstraat 80, 1011 DK Amsterdam, the Netherlands);
- to the Company's Speak Up Line by phone or website.

OTHERS

If you are not an employee of JDE Peet's, you can report suspected misconduct:

- to your most senior JDE Peet's contact;
- to the JDE Peet's central Compliance team in Amsterdam, the Netherlands, by sending an email or letter (to JDE Peet's, Global Compliance Officer, Oosterdoksstraat 80, 1011 DK Amsterdam, the Netherlands);
- to the Company's Speak Up Line by phone or website.

Our Speak Up Line is managed by an external company, independent from JDE Peet's. This line is available when you may not feel comfortable talking to someone in person or if you prefer to remain anonymous.

You are encouraged to raise any concerns you may have via the above mentioned channels. By doing so you give the Company the opportunity to address any issues. However, besides internal reporting, the laws of some countries may also allow you to report certain suspected misconduct directly to the competent authorities, and nothing in this policy is intended to prevent you from doing so in line with locally applicable rules and regulations. Please consult the central Compliance team in Amsterdam or the websites of relevant competent authorities for more information on how to report suspected misconduct directly to the competent authorities.

WHAT SORT OF INFORMATION SHOULD I PROVIDE WHEN I SPEAK UP?

When filing a report, please provide as much information as you can. This helps the Company to assess and, if needed, to initiate an investigation. You are encouraged to speak up as soon as possible and share the facts that you have. It is for instance helpful to provide:

- a detailed description of your concern and any background
- dates, names and places
- any supporting documentation

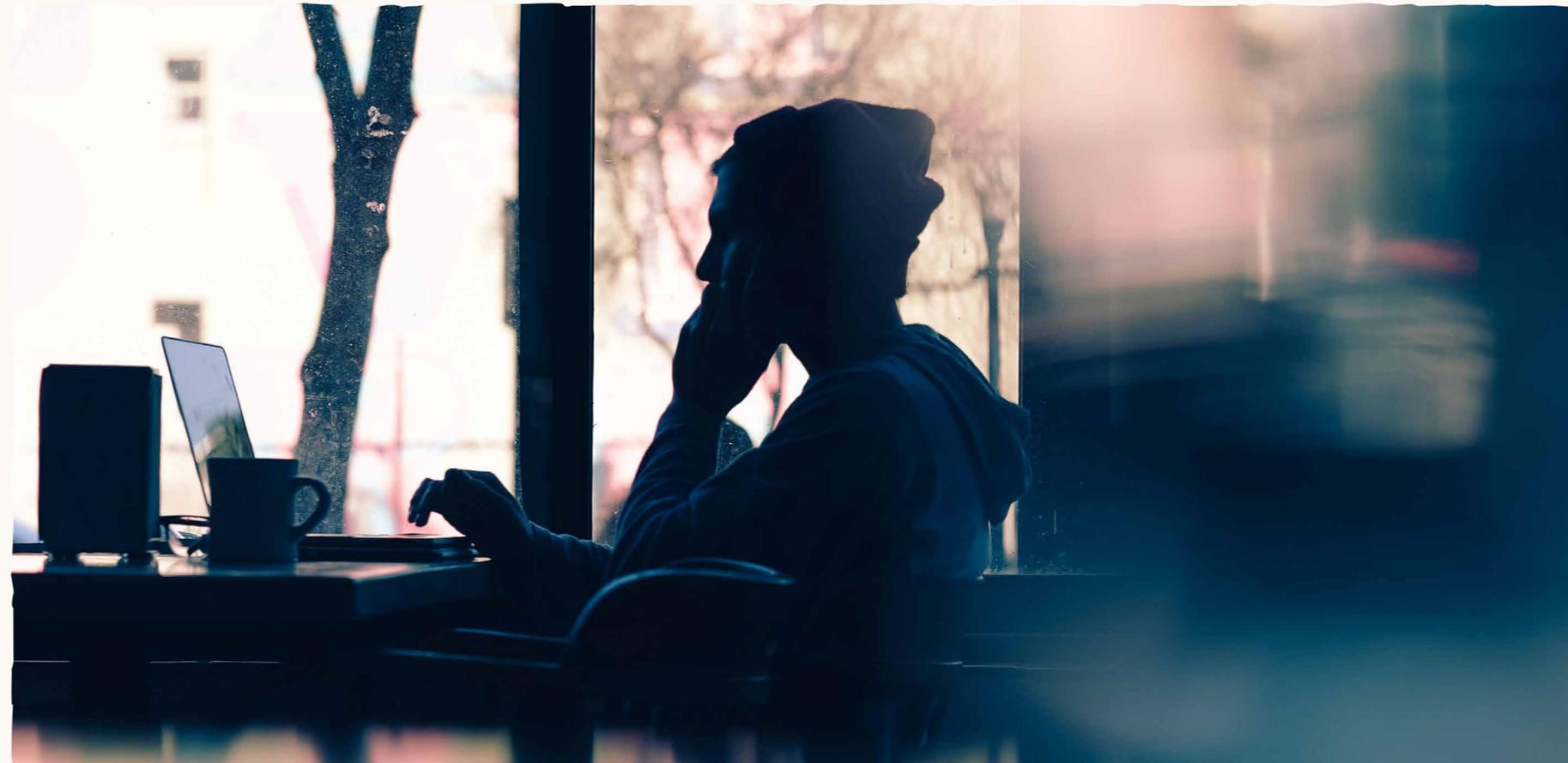
The Company does not expect you to have all the answers, to investigate the matter yourself or that you prove that your concern is well founded. Let the Company look into the report to determine whether there is a reason for concern and what should be done.

WHAT IF I REPORT SOMETHING TO MY MANAGER AND I AM TOLD TO “KEEP QUIET” ABOUT IT?

If you think that you’re being discouraged from reporting suspected misconduct, you should report both the suspected misconduct and the fact that you have been told to “keep quiet.”

WHAT SHOULD I DO IF AN EMPLOYEE OR OTHER STAKEHOLDER REPORTS POTENTIAL MISCONDUCT TO ME?

If an employee or other stakeholder of JDE Peet’s raises a concern about suspected misconduct, you should immediately report it to the Company’s Speak Up Line.





WILL MY IDENTITY BE KEPT CONFIDENTIAL?

If a reporter wants to remain anonymous, the Speak Up Line and other speak up channels will allow for that, if permitted in a specific country. In relation to the Speak Up Line, the reporter will be given a unique code by the system for follow-up purposes; with this code the reporter can verify any follow-up by the Company.

The Company will handle all reports respectfully and with discretion. Any information about the reported concern, including the identity of the reporter and any other party mentioned in the report, shall be kept confidential. Of course, certain individuals need to know of the report and the specifics of the allegation for effective investigation and follow-up. Nevertheless, besides the persons who need to know of the report and specifics of the allegation for investigation and follow-up, your identity and any information from which your identity may be directly or indirectly deduced from, if known, will not be disclosed by the Company, unless you have explicitly

agreed to sharing such information. Please note that there may be times when the Company has a legal obligation to inform third parties about reported (compliance) issues and there may be situations in which your identity needs to be shared based on applicable law. If such is the case, you will be informed prior to sharing, unless sharing this information would jeopardise the related investigations or legal proceedings.



HOW WILL MY REPORTED CONCERN BE HANDLED?

The Company takes all reports seriously. After submission of a report, you will get a confirmation of receipt. After that, the Company's Global Compliance Officer or someone assigned by Global Compliance Officer, will perform a first review and, if necessary, an investigation will be launched in order for the report to be appropriately investigated. Investigations are conducted in accordance with the Company's Investigation Principles and Approach and with due observance of applicable laws.

This guarantees that the investigation is conducted in a fair manner and responsibly with respect to all parties involved including that any investigation should be:

- Impartial, non-biased
- Timely
- Focused on fact finding

After receiving the acknowledgement of receipt, a reporter will receive a general update on the status of the investigation. Going forward, a reporter will receive general information on the progress of the investigation, and closing of its investigation and its outcome (including steps and actions taken), unless giving such feedback would be detrimental to the investigation. The Company aims to conclude investigations within 90 days, which may be extended if reasonably necessitated by the nature and complexity of the investigation.

All necessary precautions will be taken to ensure personal data is protected from unauthorised access and processing.

WHAT IF I AM NOT SURE I WANT TO RAISE A COMPLIANCE CONCERN?

We realise that it can be hard to raise concerns. Generally, people don't do so for a couple of reasons.

First, they may fear retaliation. Please be assured that the Company will not tolerate retaliation against anyone who in good faith raises a concern.

Another reason people don't raise concerns is that they fear nothing will happen. We can assure you that any time a reporter raises a concern about suspected misconduct, we will take action if appropriate and will respond. If we determine that misconduct has occurred, the Company will take appropriate corrective action.

HOW WILL I BE PROTECTED?

Any employee who reports suspected misconduct, which the employee believes, or may in good faith reasonably believe, to be true, will be given protection for such reporting. This protection means that the Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any such employee who has in good faith made, or assisted in the making of, a report. The Company does not tolerate any form of (attempted) threat, retaliation or other action. Any such (attempted) threat, retaliation or other action must immediately be reported.

In addition, the Company does not tolerate any form of (attempted) threat, retaliation or other action against any other person or entity who has in good faith made, or assisted in the making of, a report. If the Company learns of any such (attempted) threat, retaliation or other action, it will take appropriate measures.

WHAT IF I BELIEVE THAT I MAY HAVE BEEN INVOLVED IN CONDUCT THAT VIOLATES THE LAW OR COMPANY POLICY?

As an employee of the Company, you are expected to know and comply with all applicable laws, regulations and Company policies. In the event that you feel you may have violated a law or policy, it is always better to self-report than to be the subject of another person's allegations. While self-reporting a violation does not shield an employee from disciplinary or other corrective action, it is an important factor the Company will consider when deciding what action to take.

REPORTING

The Local Compliance Councils, chaired by the Local Compliance Counsels, will regularly issue an overview of the reports received and outcomes to the Global Compliance Officer.

The Global Compliance Officer will regularly issue an overview of local and global reports received to the Global Compliance Council and the Audit Committee of the Board.

HOW CAN I LEARN MORE?

You also can visit the Intranet Site to learn more about our Governance & Compliance framework and Policies.

Or send an email to Central Compliance.

You can also find the relevant policies at JDE Peet's website.

3. CONTACT / REPORT

HOW TO CONTACT THE JDE PEET'S SPEAK UP LINE?

The Company's Speak Up Line is available for everybody within and outside of the Company 24/7 online or by telephone and allows to inform the Company of suspected misconduct in many different languages, in a secure and confidential reporting environment with strict access controls.

If allowed under applicable law and if you would be more comfortable doing so, you may contact the Speak Up Line anonymously. Your information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and following up on the concerns you raise.

You can contact the Speak Up Line through the below numbers.

YOU MAY CONTACT US ANY TIME

 001 (800) 461-9330

If you are dialling internationally, visit the reporting tool and choose your location from the list for the international number assigned to your country.

If your country is not listed, use the following number +1-720-514-4400 for a collect call/reverse charge call. Operator assistance may be required and local charges may apply.

 +1-720-514-4400

Link to the Speak Up Line:

Email:

Speak Up page on our company website:

4. JDE PEET'S INVESTIGATION PRINCIPLES & APPROACH

- The person reporting suspected misconduct receives an acknowledgement of receipt of the report within 7 days.
- The Global Compliance Officer or someone else assigned by Global Compliance Officer, will review the report and, where needed, will initiate an investigation and appoint an investigation team. This could be a local team, but also a global team or an external party which the Company may engage with to conduct an investigation.
- The person reporting the suspected misconduct will receive a general update on the status of the investigation within a reasonable timeframe, noting that the Company aims to conclude investigations within 90 days after the receipt of the report, which may be extended to as may be reasonably justified due to the nature or the complexity of the investigation as well as other relevant factors.
- All personal data acquired during an investigation will be subject to applicable data protection regulations.
- The investigation shall be conducted in an impartial, non-biased, honest, fair, timely manner and with due observance of applicable laws.
- The investigation will be focused on an objective, factual analysis of the case, with the purpose to determine, through fact finding, if the reported misconducted took place. Where needed, outside experts may be engaged by the investigation team to assist in the investigation. The investigation team shall use such investigation methods as appropriate, proportional and relevant, to the investigation considering the severity, difficulty and available facts of the suspected breaches, in line with applicable law.
- The information shall be provided to the interviewee in such a manner as to safeguard as much as possible the confidentiality of the identity of the reporter, as well as any other third parties mentioned in the report consistent with the terms of this Speak Up Policy.



- The investigation team will ensure compliance with the principle of “fair hearing”, thereby giving the person or entity accused sufficient opportunity to provide their views in relation to the allegation(s).
- The investigation and all information relating to the investigation shall be kept confidential and be confined to those persons who have a need to know in relation to such information consistent with the terms of this Speak Up Policy.
- The investigation team will prepare a final report including facts, evidence and recommended actions.
- The investigation team shall inform the person or entity accused of the investigation outcome as soon as the investigation has been completed.
- The investigation team shall inform the reporter about the closure and any conclusions of the investigation, to the extent deemed appropriate by the investigation team. As certain remedial actions may involve other persons or entities, for reasons of confidentiality, privacy and the legal rights of all concerned, as may be applicable, the investigation team may only state that appropriate action has been taken.
- All personal data in cases that have been found to be unsubstantiated shall be immediately destroyed in accordance with applicable laws.



JDE Peet's

A COFFEE & TEA FOR EVERY CUP

