SHV Speak Up policy

Ethics & Compliance
Date: 26 November 2025

Version: V5.0

SHV

Content

	Chapter	Page
1	**Introduction**	**3**
2	**Purpose**	**3**
3	**Scope**	**3**
4	**Reportable concerns**	**4**
5	**Reporting channels**	**4**
6	**Reporting in good faith**	**4**
7	**Anonymity**	**5**
8	**Confidentiality**	**5**
9	**Investigation process**	**5**
10	**Protection against retaliation**	**6**
11	**Record keeping and privacy**	**6**
12	**Accountability of management**	**6**
13	**Reporting concerns about Speak Up**	**6**

SHV Internal

1 Introduction

SHV has established this speak up policy (hereafter: the “policy”) to allow for reporting of workplace-related concerns. It describes roles and responsibilities as well as rights and obligations.

Speaking up is very important, because when concerns are reported we can solve issues and improve controls in a safe and respectful way. Employees are encouraged to report a concern to their manager, HR or the Ethics & Compliance department. Another way to report a concern is through the SHV Speak Up website or phone line (hereafter: the “Speak Up service”). As described in SHV’s Business Support Framework, the Speak Up service allows employees to report – directly and, if so desired, anonymously – to SHV Holdings. The possibility to report directly to SHV Holdings is a key control in SHV’s decentralised organisation.

More information about the Speak Up service can be found on www.shvspeakup.com.

2 Purpose

This policy explains how concerns or issues can be reported, be it serious concerns or concerns that may seem less serious, but nevertheless require attention.

The policy describes how reports of concerns and issues are handled and which rights and obligations apply. SHV will take every reasonable effort to ensure a fair and objective handling of all reports.

3 Scope

This policy is for all employees of SHV companies worldwide, regardless of the legal basis of the working relationship, the position or the function of the employee. Third parties may also use the procedures described in this policy to raise concerns related to suspected breaches of the law and our values or to raise other serious concerns of an ethical nature.

All Groups and business units must comply with this policy and ensure employees are familiar with it. Some Groups and business units may have their own policies and procedures for reporting concerns. Such procedures are leading. However, any employee may at all times report a concern under this policy and be certain of the application of its contents.

This policy is based on Dutch and EU legislation. If at any point the rules in this policy conflict with the law in the country the employee is working in, local law will take precedence.

SHV Internal

4 Reportable concerns

A reportable concern is any concern or issue that may be viewed as a breach of:

- SHV's Purpose: "Courage to care for generations to come" and values: Integrity, Trust, Curiosity, Inclusivity and Passion;
- Any applicable code of conduct;
- Any SHV, Group or business unit policies and guidelines;
- Local laws, rules or regulations.

This also includes situations in which a previously reported concern has not been properly dealt with, or in which the public interest in general is or could be at stake.

Reported concerns should always be based on reasonable grounds.

5 Reporting channels

Anyone who wants to report a concern (hereafter: "reporter") has several ways to do this:

1. **At local level (*preferred option*)**
   Raise the concern with the person involved, if appropriate, or speak to a manager or HR advisor or the Ethics & Compliance officer (*in some countries there may also be a confidential counsellor available for advice*).
2. **At Group level**
   Report the concern to the Group Ethics & Compliance Officer (*ECO*).
3. **At SHV level**
   If the reporter is uncomfortable or unable to report through any of the channels above, he or she may use the Speak Up service. SHV has engaged an independent outside party for the initial handling of Speak Up reports.
4. **External reporting to local authorities**
   In addition to making an internal report, local law may offer the reporter an option to report to the appropriate local authorities.

6 Reporting in good faith

SHV employees may only report genuine concerns. False accusations can have a significant impact on individual reputations and on SHV's reputation.

When an employee reports a concern this does not automatically result in immunity for any misconducts of their own. When a report is made in bad faith or when the report involves conduct of the reporter that could constitute a breach of law, the reporter's protection cannot be guaranteed.

Employees found to be deliberately falsifying reports or acting in a manner that is not consistent with SHV's Codes and Policies may be subject to disciplinary action, up to and including termination of employment.

SHV Internal

7 Anonymity

SHV encourages reporting persons to provide their identity as a means to facilitate the investigation. However, reports can be made anonymously. The reported concern will then be investigated using the information provided.

If the reporter uses the Speak Up service anonymously, SHV expects them to be available for further questions during the investigation. These questions or other feedback will be available via the Speak Up service. Anonymous reporters should check for questions or feedback regularly, otherwise we may have insufficient information to start an investigation.

8 Confidentiality

Reports will be treated in a confidential manner. All persons, including the reporter, are required to safeguard confidentiality regarding any report, finding and investigation. Only individuals whose involvement is necessary for the handling or investigation of the concern may have knowledge of the identity of the reporting employee. Confidentiality may be waived only if the reporter provides written consent. SHV is allowed to share reports and any related facts if there is a legal requirement.

9 Investigation process

A reported concern will be handled objectively and in principle locally, on a management level that is at least one level up from where the issue reportedly exists. SHV takes reports very seriously. Therefore, a reported concern will be analysed on its merits before taking next steps:

1. If a concern is deemed legitimate and within the scope of this policy, the information received will be assessed to determine the appropriate course of action. The Ethics & Compliance department will assess if there is sufficient information for an effective investigation.
2. The reporters concern will be acknowledged within seven days of receipt of the report.
3. The reporter will be informed of the status of the process in a timely manner, and no later than four weeks after the date of the report. The reporter will receive general information on the progress of the case handling and of its outcome, unless giving such feedback would be detrimental to the investigation or otherwise. If a report has been made anonymously, the Speak Up service will be used to communicate with the reporter.

Depending on the nature of the concern, an appropriate investigation team will be set up.

Any person under investigation will be notified, if necessary, after safeguarding relevant evidence, unless such notification could jeopardise the investigation.

The reporter and the person or persons under investigation each have the right to be heard during the investigation and can have a trusted person present at the hearing.

SHV Internal

10 Protection against retaliation

SHV does not accept retaliation. Retaliation means that a reporter experiences negative consequences within SHV, for instance by becoming isolated from their team or by being denied a justified bonus. When a reporter can be reasonably believed to have made a report in good faith, SHV will make every reasonable effort to protect him or her from retaliation.

If a reporter, a witness or anyone involved in the handling and investigation of a report believes that he or she has been subject to retaliation, they should immediately contact their HR manager, the ECO, the ECD or report the retaliation through the Speak Up service. Persons found to have engaged in retaliation may be subject to disciplinary action up to and including termination of employment or contract for services.

11 Record keeping and privacy

All documents relating to reports must be retained and destroyed in accordance with the Speak Up Privacy Notice and applicable laws and regulations.

For information about the way in which SHV processes and safeguards any personal data, please consult the Speak Up Privacy Notice that is available on www.shvspeakup.com.

12 Accountability of management

SHV expects management at all levels to handle all reported concerns seriously, confidentially and promptly. Management has a responsibility to actively support this policy and the SHV Speak Up programme. Management is expected to cooperate with and assist appointed investigators. Neglecting to do so may result in disciplinary action.

13 Reporting concerns about Speak Up

Concerns about the functioning of the Speak Up service and investigation process are important and should be reported to the Corporate Ethics & Compliance Director (ECD) of SHV Holdings. Such a report can be made through ethicsandcompliance@shv.nl.

SHV Internal

Appendix – Version history

Version	Purpose/Change	Author	Date
1.0	First version approved by SHV Executive Board of Directors (EBD)	Ethics & Compliance	18 January 2017
2.0	- Review regarding new EU Directive on Whistleblowing (Directive (EU) 2019/1937) - Adjusted references - Textual improvements Approved by EBD.	Ethics & Compliance	26 March 2020
3.0	- Review regarding new Purpose and values - Review & No Change	Ethics & Compliance Ethics & Compliance	01 December 2021 01 December 2022
4.0	- Review regarding new EU Directive on Whistleblowing (Directive (EU) 2019/1937) and National Requirements: Updated investigation process to include existing procedure of providing the reporter with an acknowledgement of their report within seven days of the report. - Textual improvements Approved by EBD	Ethics & Compliance	18 October 2023
	- Change to Front page Header to address rebranding	Ethics & Compliance	February 2025
5.0	- Section 11. Removal of first line	Ethics & Compliance	November 2025

SHV Internal