

We do the
right thing
Everytime.
Everywhere.



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About Speak Up

What is the Speak Up service?

The Speak Up service is a comprehensive and confidential reporting tool created by Navex Global Inc. (“Navex”) that enables Kerry management and employees and other stakeholders to work together to address potential violations of our Code of Conduct, policies, regulations, industry standards or applicable laws, including fraud, corruption, abuse, and other misconduct in the workplace, while cultivating a positive work environment.

Why do we need a service like Speak Up?

- > Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximise productivity.
- > An effective reporting system supports and enhances our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report on the Speak Up service using either the Internet or telephone?

Yes. The Speak Up service enables you to file a confidential, anonymous report via either telephone or the Internet.

What types of situations should I report?

The Speak Up service allows employees to report any potential violation of our Code of Conduct, our policies as well as all applicable laws, regulations and industry standards.

If I see a potential violation, should I just report it to my line manager or to Human Resources or to the Ethics and Compliance Team and let them deal with it?

When you observe behaviour that you believe violates our Code of Conduct, our policies or applicable laws, regulations or industry standards, we expect you to report it. Ideally, you should bring any concerns forward to:

- (a) your line manager; or
- (b) a senior manager; or
- (c) a Human Resources Partner; or
- (d) a member of the Ethics and Compliance Team by email (GlobalCompliance.KerryGroupLegal@kerry.com) or post to Ethics & Compliance Team, Legal Department, Prince's Street, Tralee, Co. Kerry, Ireland.

We recognise, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with Navex for the Speak Up service. We would rather you report using the Speak Up service than keep the information to yourself.

Why should I report what I know? What is in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Also, corporate misconduct can threaten the very existence of an entire company.

Does Kerry management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in Kerry - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on Kerry and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the Speak Up service secure server. Navex makes these reports available only to the Ethics and Compliance Team within Kerry who are charged with evaluating the report, based on the type of potential violation and location of the incident. Each member of the Ethics and Compliance Team is from Legal and they have had training in handling reports and keeping them confidential.

Is this Speak Up service just an example of someone watching over me?

No. The Speak Up service is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security and Confidentiality

It is my understanding that any report I send from a Kerry computer generates a server log that shows every website that my computer connects with. Will this log identify me as the report originator?

Navex and the Speak Up service **does not generate or maintain** any internal connection logs with IP addresses, so no information linking your computer to the Speak Up service is available.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside of your work environment (such as one located at an Internet café or at a friend's house) through the Speak Up service secure website. Many people choose this option, as Navex's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Speak Up service strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide through the Speak Up service will ultimately reveal my identity. How can you assure me that will not happen?

The Speak Up service protects your anonymity. However, if you wish to remain anonymous, you – as a reporting party – need to ensure that the body of the report does not reveal your identity by accident (for example, "From my desk next to John Smith...").

Is the telephone freephone hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the Speak Up Website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish. Giving your name is likely to help our Ethics and Compliance Team investigate the issue you have raised, because it enables us to contact you if we have any questions or if we require further information.

Tips and Best Practices

I am aware of some individuals acting unethically, but it does not affect me. Why should I bother reporting it?

Our company promotes ethical behaviour. All unethical conduct, at any level, ultimately hurts Kerry and its employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of potential misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

I am not sure if what I have observed or heard is a potential violation of Kerry policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. The Speak Up service can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless or untrue than let possible unethical behaviour go unchecked.

What if my boss or other managers are involved in a potential violation? Will they get the report and start a cover-up?

The Speak Up service and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the Ethics and Compliance Team have further questions for me concerning my report?

When you file a report on the Speak Up Website or through the Speak Up Call Centre, you receive a unique, randomised number called a “Report Key” and are asked to choose a password. You can return to the Speak Up service again either by Internet or telephone and access the original report to add more detail or answer questions posed by a member of the Ethics and Compliance Team. We strongly suggest that you return to the site in the time specified to answer questions from the Ethics and Compliance Team. You and Kerry now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Speak Up service correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

What if I lose my Report Key or forget the password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still file a report if I do not have access to the Internet?

You can file a Speak Up report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you do not have access to or are uncomfortable using a computer, you can call the Speak Up Call Centre which is the freephone hotline and it is available 24 hours a day, 365 days a year. The Speak Up Call Centre is staffed by professional specialists from Navex Global Inc. who will listen to your concerns in your language.