

KERRY GROUP PLC

Speak Up Policy

INTRODUCTION

Kerry Group is committed to doing business with integrity and ensuring that business results are always achieved ethically and legally in compliance with our Code of Conduct and laws that relate to our everyday work. If you become aware or suspect that something is potentially illegal, unethical, unsafe or contrary to our Code of Conduct, human rights or applicable laws, we encourage you to promptly report your concern so that a timely investigation and appropriate remedial action can be taken.

Policy Objectives

This policy aims to:

- (a) provide a process for Kerry Group employees and third parties to report any concerns they have about Kerry so that a timely investigation and appropriate remedial action can be taken by Kerry;
- (b) provide guidance to employees and third parties about how to report concerns they have about Kerry;
- (c) encourage employees and third parties to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected; and
- (d) reassure employees and third parties that they should be able to report genuine concerns without fear of retaliation, even if they turn out to be mistaken.

This policy should be read and understood in conjunction with Kerry's Code of Conduct.

Policy Scope

This policy applies to Kerry Group plc and all subsidiaries, associated companies, joint venture partners and to all employees worldwide (including officers, directors, contracted personnel, part-time, casual workers, agency workers, interns, etc). This policy applies to all locations where Kerry conducts business.

This policy may be augmented or adjusted by other local jurisdictional laws as well as process policies and procedures and the stricter law or policy applies.

This policy does not form part of an employee's contract of employment, and it may be amended at any time.

Definitions

Business Integrity Committee: the compliance committee of Kerry Group which reports on a regular basis to the executive management and Board of Kerry Group upon areas of business integrity or ethical compliance.

Ethics and Compliance Team: comprised of employees from Legal in charge of approvals, investigations, advice, training, testing and monitoring this policy.

Our Commitment to Speaking Up

Kerry values anyone who speaks up about ethical and human rights issues and reports any potential breaches of our Code of Conduct, human rights or applicable laws.

We encourage openness and we will support anyone who reports concerns under this policy.

It is in this context that Kerry has established reporting channels and mechanisms aimed at collecting reports of complaints and concerns from anyone so that an appropriate investigation and remedial actions can be completed where necessary.

Our Commitment to Non-Retaliation

We know that raising a concern takes courage, and sometimes you may be reluctant or worried because you fear a reaction from your colleagues or others.

We want you to feel supported and not have any fear of retaliation.

We are committed to ensuring that you are protected from any form of retaliation if you report a concern under this policy.

Retaliation against anyone who reports a concern or assists in an investigation in good faith is prohibited under this policy. See further **under Protection from Retaliation**.

Who can Report Concerns to Kerry?

Under this policy, reports of potential breaches by Kerry of our Code of Conduct, human rights or applicable laws can be received from employees and third parties.

Ways to Report Your Concerns

We encourage you to contact someone in Kerry to report your concerns about Kerry, in line with this policy.

There are a number of ways for you to report internally your concerns about Kerry.

Employees

You can contact a local line manager, or a senior manager, or a human resources partner, or a lawyer in the Ethics and Compliance Team (speakup@kerry.com).

Alternatively, you can contact our Speak Up system on a confidential and anonymous basis if you find speaking to another Kerry employee or to the Ethics and Compliance Team too difficult or impractical.

Third Parties

Third parties can contact the Ethics and Compliance Team (speakup@kerry.com).

Alternatively, third parties can contact our Speak Up system which is open to third parties on a confidential and anonymous basis.

Our Speak Up System

The Speak Up system is operated by an external and independent company. This company provides a confidential online and freephone call service, 24 hours a day, 365 days a year.

The Speak Up system can be accessed online from MyKerry or via the Kerry Group website (www.kerry.com).

The Speak Up system freephone telephone numbers are on the last page of this policy.

Reports coming through the Speak Up system are handled discreetly and in a confidential manner and promptly forwarded to our lawyers in the Ethics and Compliance Team.

Which Concerns Can You Report?

We encourage the reporting of concerns about suspected breaches involving Kerry of:

- (a) local laws or regulations in countries where Kerry is present or doing business;
- (b) human rights; and
- (c) Kerry's Code of Conduct.

This includes, for example, allegations of:

- (i) bribery, corruption, money laundering, fraud, tax evasion, other financial misconduct or criminal activity;
- (ii) health and safety risks;
- (iii) bullying, discrimination relating to Kerry's organisation;
- (iv) sexual harassment and other forms of harassment based on marital status, race, colour, ethnicity, nationality, disability, religion, beliefs, age, under local laws and relating to Kerry's organisation;
- (v) abuse of Kerry property (including intellectual property), unauthorised disclosure of confidential information and breach of data protection requirements; and
- (vi) breach of human rights in Kerry's value chain, including climate change, environment impacts, damage to the environment, labour conditions, human trafficking, forced or compulsory labour, child labour; working conditions, economic inclusion, living standards, equal opportunities, freedom of association, collective bargaining, mechanisms and access to remedy, community impacts.

This policy should not be used for complaints relating to your own personal circumstances, such as your employment circumstances, issues related to your job, benefits, promotions, appraisals, or status or your personal conflicts with other employees (including, complaints about bullying, harassment and discrimination which relate only to you). In those cases, you should speak to your manager in the first instance or your HR team.

If you are uncertain whether your concern is within the scope of this policy, you can contact the Speak Up system or seek advice from the Ethics and Compliance Team (see Contact Details).

If you report a concern to your manager or your HR team and it is a concern which should be dealt with under this policy, then your manager or your HR team may submit your concern to the Speak Up system for handling by the Ethics and Compliance Team and if

appropriate the processes and procedures in this policy will be followed.

You should only report a concern in good faith, with reasonable grounds to believe that the reported information is true.

You must not deliberately conceal any wrongdoing or hinder or obstruct, in any way whatsoever, the reporting of a concern by another person.

A deliberate concealment, hinderance or obstruction may result in sanctions under local laws in some jurisdictions.

Remaining Anonymous

We hope that you will feel able to voice concerns openly under this policy. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

By giving your name you enable us to contact you if we have any questions or require further information and evidence and this will help the investigation of the issue you have reported. An investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

What Happens to Your Report?

Reports Submitted to the Speak Up System or Ethics and Compliance Team

Once you have submitted your report on the Speak Up system or directly to the Ethics and Compliance Team it will go through the following steps:

- (1) We will send you an acknowledgment within seven (7) days.
- (2) We will evaluate your report to determine if the report is about a concern covered by this policy.
- (3) If your report is not relevant to this policy, we may redirect you to the right contacts in Kerry.
- (4) If your report is relevant to this policy, and it includes sufficient actionable information and evidence, we will open an investigation.
- (5) If your report does not include sufficient actionable information or evidence, we will ask you to provide more information and evidence before opening an investigation. You should provide accurate and objective information about the facts. Include any documents supporting your report.

- (6) We will aim to keep you regularly informed of the progress of the investigation. You may be required to provide further information about your report.
- (7) As a general practice, it can take up to 90 days for an investigation to be concluded. We may need more time for complex matters.
- (8) We may involve a human resource partner, other Kerry employees or external consultants for investigations, decision making and remediation.
- (9) After reviewing all the evidence, we will decide if any further action needs to be taken. We will inform you of the outcome of the investigation. Sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result.

Reports Submitted to Others in Kerry

If you send your report of a concern by letter or email or other means to a line manager, or a senior manager, or a human resources partner, then the Kerry employee receiving your report will evaluate your report and be in communication with you.

The Kerry employee receiving your report will manage the report as follows:

- (a) record the report on the Speak Up system;
- (b) conduct an investigation; and
- (c) make decisions and actions, as appropriate according to this policy.

If your report involves complex issues, or if the Kerry employee needs support from the Ethics and Compliance Team, they may transfer your report to the Ethics and Compliance Team and the steps above will be followed by the Ethics and Compliance Team.

Reports Concerning a Business Partner

If you send a report of a concern about one of our business partners, then the process under the Vendor Grievance Policy will be followed.

Unattended Reports

If you reported a concern to a Kerry employee and you have not received any feedback, you can contact the Speak Up system or the Ethics and Compliance Team for assistance.

If you reported a concern to the Speak Up system or the Ethics and Compliance Team and you do not receive any feedback, or if you have a concern about the process or outcome, then you can contact the Kerry Group General Counsel (LegalAdministration@kerry.com). The Group General Counsel may decide to appoint another senior employee or an independent third party to review the complaint or concern. Kerry is committed to ensuring all such issues are handled fairly and properly.

Remedial Action

We are committed to remediating all proven non-compliance in our businesses and operations where they have been shown to cause or contribute to a breach of our Code of Conduct, human rights or applicable laws.

We will take timely monitored remedial action to resolve any such non-compliance in our businesses and operations.

We will resolve any such non-compliance in our businesses and operations by communicating the recommended remedy to senior managers, thereafter we will engage with relevant businesses or functions to monitor the implementation of an agreed remedy until the remedy is implemented. We may request changes to systems, processes, and practices to stop similar impacts. We will share an approach to learning from an incident to prevent future impacts.

Access to Remedy and Mechanisms

On occasions where employees or third parties consider that their rights have been impacted and feel they are not able to approach us directly, we recognise their right to access to remedy.

We will not hinder their access to state-based judicial or non-judicial mechanisms and we will seek to co-operate as required and allowed with competent authorities in investigating or adjudicating alleged rights impacts.

We will refrain from the use of legal actions against anyone which may infringe on their rights and freedoms, and any other actions which serve to criminalise and delegitimise human rights and environmental defenders.

Confidentiality

Regardless of how you choose to report your concerns, the information you provide will only be shared with individuals who have a need to know or who are necessary to complete an investigation and take any decisions and required remedial actions.

We will make our best effort to keep your identity, the reported facts and the identity of the persons covered by the report confidential.

Any information that can reveal your identity will not be disclosed without your consent, unless we are required to do so by law or by a judicial authority, or it is necessary to conduct the internal investigation.

In addition, information relating to the identity of other people covered by the report will not be

communicated, unless we are required to do so by law or by a judicial authority.

Protection from Retaliation

We have zero tolerance against any threats, intimidation, violence or reprisals against anyone, including employees and human rights defenders, who report a concern about Kerry.

Employees must not threaten or retaliate against another employee or another person in any way. If an employee is involved in such conduct, he/she may be subject to disciplinary action.

If you believe that you have been subject to or threatened with retaliation of any kind, you should contact the Ethics and Compliance Team or the Speak Up system.

An employee will not be subject to disciplinary measures or incur any negative impact on their employment (or relationship with Kerry) for reporting a concern or assisting in an investigation in good faith.

Personal Data

Data processing is implemented in order to collect and process reports aimed at revealing a suspected breach of local laws in other countries, or suspected wrongdoing and dangers in relation to Kerry's activities, or suspected breaches of our Code of Conduct, human rights or applicable laws.

Reports will be stored for no longer than is necessary and proportionate in order to comply with legal requirements under local laws.

We will delete the data collected in relation to reports not relevant to this policy or if there is no investigation or follow-up without delay.

If an investigation is initiated, the data collected will be kept until the end of the procedure and the expiry of the legal remedies.

Data may be kept in archive mode for longer periods where legally required.

Your Personal Data Rights

The persons concerned by this policy (may have, in accordance with the limits of EU law and local laws in other countries, a number of rights, including, a right of access and rectification, a right of objection, a right to limit processing, as well as the right to define guidelines on the fate of their personal data after their death, in accordance with EU law and local laws in other countries.

For this purpose, you can contact Kerry's Data Protection Officer.

If you consider that the use of your personal data does not comply with data protection regulations, you have the right to file a complaint with the national authority for the protection of personal data.

Learning

Employees are required to take relevant training and learning courses on the Learning Management System. The Ethics and Compliance Team will track and keep records of the learning completion.

Communications

New laws may be imposed by national governments and international bodies at any time. The Ethics and Compliance Team will monitor the risks faced by Kerry on an ongoing basis, taking account of current business strategies, and update this policy as necessary.

Breach of this Policy

The Ethics and Compliance Team will ensure that any potential breaches of this policy are investigated, and appropriate mitigation steps are taken. These may include reporting breaches of laws to the relevant authorities.

If an employee breaches this policy (or on reasonable suspicion an employee has breached this policy), the employee may be subject to a disciplinary procedure. The outcome of that disciplinary procedure may be a dismissal and/or a report to the regulatory authorities and possible prosecution for an offence if the breach of this policy is also a breach of applicable laws.

If we conclude that an employee reporting a concern has made false allegations maliciously, this employee may be subject to disciplinary action.

Contact Details

Ethics and Compliance Team

Ethics & Compliance Team, Legal Department, Prince's Street, Tralee, Co. Kerry, Ireland.

Contact the Ethics and Compliance Team on ethicsandcomplianceteam@kerry.com for further advice and information relating to this policy.

Contact the Ethics and Compliance Team on speakup@kerry.com if you have concerns relating to a potential breach of this policy.

Data Protection Officer

Data Protection Officer, Kerry Global Technology & Innovation Centre, Millennium Park, Naas, Co. Kildare, Ireland.

Contact the Data Protection Officer on data.protection@kerry.com for further advice and information relating to your rights under this policy.

Responsibility

This policy is owned and maintained by Legal. Legal (through the Ethics and Compliance Team) is responsible for the creation, administration, updating and communication of this policy and related training and learning courses.

The Ethics and Compliance Team will use feedback and testing and monitoring results to improve the Speak Up system and management of reports. All employees are collectively responsible for ensuring compliance.

The Ethics and Compliance Team will, in conjunction with the employees responsible for compliance:

- (a) monitor the effectiveness and implementation of this policy and make any necessary changes to this policy. This will include appropriate testing of compliance with this policy (including as part of the internal audits carried out by Kerry); and
- (b) update the Business Integrity Committee, as considered necessary, on the implementation and effectiveness of this policy, and make recommendations to improve this policy and associated procedures.

You can submit comments and suggestions on the design and performance and improvement of the Speak Up system and the processes and procedures in this policy by contacting the Ethics and Compliance Team.

Employees can also volunteer to evaluate the Speak Up system by contacting the Ethics and Compliance Team.

Speak Up System Call Centre Numbers

Country	Telephone Number
Argentina	0800 345 3156
Australia	1800 512 184
Brazil	0800 000 0226
Canada	833 674 1737
Cameroon	Online Only
China	400 120 0187
Colombia	018005190510
Costa Rica	0800-032-0037
Czech Republic	800 144 526
Denmark	80 83 01 42
Egypt	0800 006 0272
El Salvador	833 674 1737
France	0800 99 02 84
Germany	0800 1821076
Guatemala	833 674 1737
Hong Kong	800 930 164
Hungary	06 80 088 409
India	000 800 919 1309
Indonesia	0800 1503228
Ireland	1800 851 698
Italy	800 761 605
Japan	0800 300 3046
Kenya	0800 211 255
Korea	Online Only
Luxembourg	800 27 365
Malaysia	1 800 81 9265
Mexico	800 681 8174

Country	Telephone Number
Netherlands	0800 0249503
New Zealand	0800 715 007
Nicaragua	833 674 1737
Nigeria	833 674 1737
Northern Ireland	833 674 1737
Oman	Online Only
Panama	833 674 1737
Philippines	1800 1 322 0012
Poland	800 005 044
Romania	0800 890 384
Rwanda	Online Only
Saudi Arabia	800 850 0347
Singapore	800 492 2512
Slovakia	Online Only
South Africa	080 098 3863
Spain	900 963 257
Sweden	020-12 73 13
Tanzania	Online Only
Thailand	1800 014711
Turkey	0800 6212331
Uganda	Online Only
Ukraine	0800 801 458
United Arab Emirates	800 035704313
United Kingdom	0800 090 3693
United States	833 674 1737
Vietnam	1800 400552