

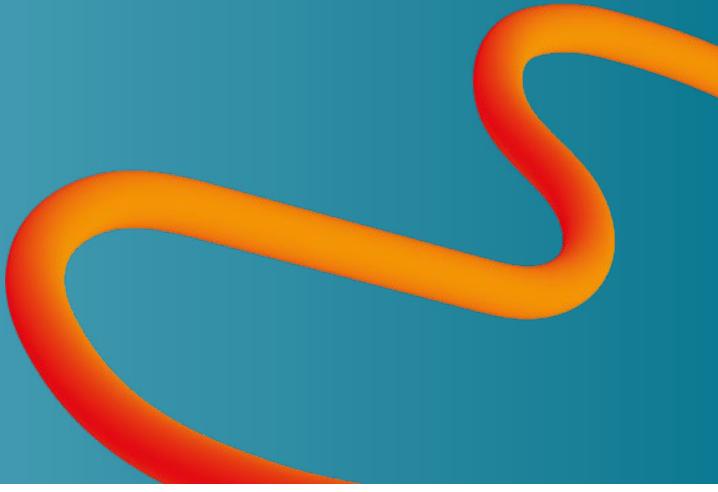
JOY
TO
GO

SELECTA SPEAKUP MANUAL



 selecta

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1. WHAT IS SPEAKUP AND WHY IS SPEAKING UP IMPORTANT?

Selecta is committed to conducting business with integrity and fairness, with respect for the law and our principles. Despite this commitment, you may one day observe conduct that concerns you, or that seems to violate our Code of Conduct and/or policies. If you observe or suspect such misconduct, you are encouraged to speak up. By doing so, you give us the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and undermine trust.

Selecta truly values the help of associates and external parties who identify and speak up about potential concerns that need to be addressed. Speaking up is encouraged and associates who speak up are protected. You will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for speaking up. After all: speaking up is essential for us to sustain our reputation, success and ability to operate – both now and in the future.

We want to hear from you regarding our Code of Conduct, and other ethics and compliance matters, so we have contracted with a third party, NAVEX Global, to offer EthicsLine. You can use this service by phone or online to ask questions and report your concerns (anonymously, where allowed by the laws of your country).

2. WHAT IS THE PURPOSE OF THIS MANUAL?

The purpose of this manual is to explain how you can raise valid concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what you can expect from Selecta if you speak up.

If something permitted or required by this manual violates local law, we must follow local law.

3. WHO CAN SPEAK UP?

Everybody is invited to speak up, both associates and external parties. Our Speak Up system is available to anyone who wishes to raise a concern about possible misconduct within Selecta.

4. WHAT CONCERNS ARE COVERED BY THIS MANUAL?

This Speak Up manual can be used to raise concerns about suspected misconduct within Selecta, that is any violation of our Code of Conduct and/or its policies under which Selecta operates.

Examples of concerns that can be raised using this Speak Up manual are:

- Fraud or theft
- Harassment, bullying or discrimination
- Violations of competition laws and rules
- Money laundering or violations of sanction laws
- Inadequate financial or non-financial recordkeeping
- Bribery
- Conflicts of interest
- Environmental, health and safety issues
- Disclosure of confidential or personal information
- Retaliation against anyone for speaking up in good faith
- Violations of any of our (other) Group policies

Do not use this manual:

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or call your country's emergency phone number
- For any grievances you may have in relation to your terms of employment
- To settle personal or legal disputes
- To make accusations which you know are false. Doing so may lead to disciplinary measures.

5. HOW TO SPEAK UP?

Concerns about suspected misconduct can be raised through a variety of channels.

If you suspect misconduct, you can raise your concerns with your leader. If you prefer not to reach out to him/her, you can contact your HR/legal representative or the managing director of your market. These representatives are strongly encouraged to ask you to complete a form that a concern has been raised for review and follow-up. Anonymity, where allowed by the laws of your country, will be guaranteed if requested by the reporter. The form will be shared only with the Group Director Internal Audit and the Group Leader Risk & Compliance for input into the EthicsLine system. All concerns must be centrally logged for proper investigation, follow up and reporting. You can follow up on the status of your report or if you have any additional information by contacting the Group Leader Risk & Compliance.

If you prefer not to reach out to any of the representatives indicated above, you can directly use our externally hosted Speak Up Line to raise concerns confidentially and in your own language. Selecta's SpeakUp Line is run by an independent third party and available 24/7, 365 days a year. To submit a report via the externally hosted SpeakUp Line, you can use the online access or phone line. All information can be found on the webpage [EthicsPoint - Selecta TMP AG](#). There you will find phone numbers by country and links if you wish to raise a concern online. The phone lines are free of charge and offer support in your local language.

If you use the SpeakUp Line (web or phone), you will be given a Report Key. It is important to make a record of this number, as it will enable you (along with the password) to review any follow-up questions or submit more information about this incident. It is a good idea to check for a response regularly. All reports received via this externally hosted Speak Up system are routed back to Selecta for further handling. Selecta's Integrity Committee oversees the company-wide efforts in relation to SpeakUp and follow-up on the matters reported.

In addition, the feature "Mobile Intake" will be available soon, and it will allow reporters to leverage a mobile device in order to submit a report. To leverage this reporting mechanism, you will simply scan the QR Code available on our organizational awareness materials, Intranet and policies, with your mobile device to start the process.

6. EXTERNAL WHISTLEBLOWING

We strongly encourage you to raise concerns internally through one of the available channels abovementioned. Taking a concern to an outside party (e.g., the media) can have serious implications for our company, for the persons involved and possibly also for yourself. By speaking up internally, you give our company the chance to look into the matter and take action if needed. In this way we can truly improve our company together.

7. WHAT INFORMATION SHOULD YOU PROVIDE?

When you file a report (in person, in writing, online or by phone), please provide as much detailed information as you can to enable our company to assess and investigate your concern, such as:

- The background, history and reason for the concern
- Names, dates, places and other relevant information
- Any documents that may support your report.

A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

Even if you do not have all the facts, we encourage you to speak up as soon as possible and to share the facts that you do have. We do not expect you to have all the answers, and you are not expected to prove that the concern is well founded. Selecta will investigate the matter to determine whether there is a genuine reason for concern. Never investigate the matter yourself, and do not seek evidence to build a case. We guarantee that no disciplinary measures or other actions will be taken against you if a genuine concern turns out to be mistaken or misguided.

8. CONFIDENTIALITY

Subject to local laws, all reporting is done confidentially. This means that information about your concern will only be shared with a limited number of people on a strict need-to-know basis. Information will only be disclosed outside this small group if we are required to do so by law or an important public interest is at stake. In principle, we are obliged to inform the implicated person that a complaint has been filed against him/her, but your identity will not be disclosed. You yourself can help us protect confidentiality by being discreet and not discussing your report with your colleagues or anyone else.

You can share your concerns anonymously (where allowed by the laws of your country). We do however encourage you to reveal your identity as it is more difficult, and in some circumstances even impossible, for us to investigate reports that are made anonymously.

9. NON-RETALIATION – HOW WILL YOU BE PROTECTED IF YOU SPEAK UP?

At Selecta we encourage people to speak up about suspected misconduct and associates are always protected when they address a valid concern. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated. Retaliation against reporters is treated as a violation of our Code of Conduct and consequently may lead to disciplinary measures. You will not be protected, however, if you maliciously raise a concern that you know is false.

If you notice any retaliation against you or against anyone else for raising or having raised a concern in good faith about suspected misconduct, report this via one of our Speak Up channels indicated above. A report on retaliation against a reporter is treated like any other Speak Up report and the same procedure is followed.

10. WHAT ABOUT PERSONAL DATA?

Selecta is committed to protecting the privacy of everyone involved. We will do everything to safeguard personal data from unauthorized access and processing. "Personal Data" means any information relating to an identified or identifiable individual. Such information may include, among others: employee master data (e.g., name, address, phone number, e-mail address, citizenship, marital status), organizational data (e.g., org. unit, cost center, personnel number), business partner, client, and supplier master data. For additional guidance refer also to our Group Policies on data privacy on the Intranet.

Any personal data obtained in relation to this manual will be used for the purposes explained in this document only and in compliance with the local legislations and regulations (i.e., General Data Protection Regulation) and our Group policies.

Speak Up reports are securely stored on a dedicated Speak Up platform. Matters reported through the Speak Up web access or telephone line are uploaded automatically. Matters reported through the form are uploaded manually by the Group Leader Risk & Compliance. All reports and personal information obtained during a review of a Speak Up report are deleted and retained according to retention and deletion rules (i.e., General Data Protection Regulation, Group Policies) and based on a case-by-case assessment. Personal data will be deleted immediately from the Speak Up platform in any of the following situations:

- If the report does not relate to events or incidents that are eligible to be reported in accordance with this manual.
- If the preliminary review finds the allegations to be obviously groundless.
- If authorities have taken over a case and our assistance and need for processing data is no longer required.

11. WHAT CAN YOU EXPECT IF YOU SPEAKUP?

We take every report of potential misconduct seriously. We investigate every case in accordance with our set standards and procedures to ensure the right quality and speed of response.

If you submit a report, you will receive a confirmation of receipt within 5 to 7 working days, with an estimate of how long it will take to handle and assess your concern. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. On average, closure of the matter can be expected within 1 to 3 months. You will be informed of the overall findings, i.e., whether or not Selecta has established that misconduct has taken place. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

All reports of concern that Selecta receives are logged into a case management system. Depending on the nature, urgency and potential impact of your concern, the case is handled locally or centrally by a Global Case Leader who works under the supervision and instruction of the Integrity Committee. A local case may also be co-handled with the central function.

Our Company follows a two-phased approach when handling concerns:

- Initial review – We assess the concern and decide if it requires further review, follow-up, and investigation (and, if so, by whom and in which form). You may be approached for additional information.
- Investigation – If the report requires further investigation, we assign it to a Case Leader. The investigation itself focuses on an objective, factual analysis of the case. If needed, outside experts (e.g., lawyers or accountants) can be engaged to assist in the investigation. They work under strict confidentiality. Review and investigation are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles. Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know and restricted basis.

12. WHAT IS EXPECTED OF YOU IN CONNECTION WITH INVESTIGATIONS?

If you become involved in an investigation, you need to cooperate and answer all questions completely and honestly. Lying to the people performing the investigation as well as delaying, interfering with or refusing to cooperate with an investigation may lead to disciplinary measures.

All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

13. MONITORING AND CONTROL

This manual has been developed in support of the Group Code of Conduct. The Selecta Integrity Committee oversees the effectiveness of this Speak Up Manual.

14. CONTACT

Speak Up line contact information: the country-specific phone numbers and contact forms are available online on the EthicsLine website:

[EthicsPoint - Selecta TMP AG](#)

For more information on Speak Up or this Manual, please contact your leader, legal department or the Group Leader Risk & Compliance.

If you believe that your concern or a concern raised against you has not been reviewed or handled properly, please inform the Selecta Group immediately via one of the Integrity Committee members (Group Chief Financial Officer, Group Chief Human Resource Officer, Group General Counsel, Director Internal Audit).

15. USEFUL LINKS AND RESOURCES

Group Code of Conduct – [Selecta Code of Conduct and Supplier Code of Conduct | My Selecta \(sharepoint.com\)](#)

Privacy Policy (General Data Protection) – [Policies | My Selecta \(sharepoint.com\)](#)

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