



Group Policy & Procedure – Speak Up Policy



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1. Foreword

Averda is committed to carrying out its business with integrity and in full compliance with the law. Although we conduct our business with the highest of ethical standards, there is always a risk of things going wrong. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

2. Purpose

The purpose of this Policy is to:

- Encourage staff 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.
- Provide staff with guidance as to how to raise those concerns.
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- Outline Averda's non-retaliation policy.

3. Scope

The Policy applies to all Averda Group companies and all Averda employees and directors, including any contracted staff under consultancy agreements, or anyone doing work on behalf of Averda.

Concerns can be raised by other Averda stakeholders such as suppliers and customers where Averda has a business relationship with the third party.

4. Speak Up

Speak Up is the reporting of suspected misconduct regarding Averda's business operations. This may include, but would not necessarily be limited to:

- 1 criminal activity
- 2 failure to comply with any legal obligation or regulatory requirement
- 3 non-compliance with Averda's Code of Business Conduct 'How we do Business' and related policies and procedures
- 4 breaches of health and safety laws and regulations
- 5 non-compliance with environmental laws and regulations
- 6 bribery and corruption
- 7 money laundering and terrorist financing
- 8 fraud
- 9 market abuse and anti-competition practices
- 10 conduct likely to damage Averda's reputation or financial wellbeing.
- 11 unauthorized disclosure of confidential information
- 12 the deliberate concealment of misconduct

If you have any genuine concerns related to suspected misconduct or danger affecting any of Averda's operations, you are required to report this under the Speak Up Policy.

This Policy is not applicable for and should not be used for reporting HR grievances or settling personal disputes. HR grievances should be raised in line with applicable HR grievance policies.

If you are uncertain whether something is within the scope of this Policy, you should seek advice from the Ethics & Compliance function.

5. Raising a Concern

We hope that in most cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases where your concern requires review, they will refer the matter to the Ethics & Compliance Function.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it your line manager for any reason, you should raise the concern directly with the Ethics & Compliance Function either in person, or through the below channels:

Speak Up Channels

| | |
|------------------------|--|
| Speak Up Portal | https://speakup.averda.com |
| Email | Compliance@averda.com |

Speak Up Portal

The Averda Speak Up Portal allows you to submit concerns through a separate dedicated Averda portal. The Speak Up platform will capture your concern in your preferred language and be sent to the Ethics & Compliance Function for review.

You can raise concerns anonymously. However, please be aware that requiring complete anonymity may practically make it more difficult for us to investigate the issue.

Averda treats all reports submitted in good faith seriously and fairly and will take appropriate measures necessary to resolve concerns. Good faith means that claims were not submitted for malicious reasons or submitted when the claims are knowingly false. Reviews are commenced based on the legitimacy of the concerns raised.

6. Confidentiality

Reported cases are considered strictly confidential. Averda protects the identity of employees who report misconduct in line with all applicable laws and regulations. Equally, when you report a case to your line manager, to Ethics & Compliance or through the Speak Up Portal, you must not share this information with any other person. This also applies if you are contacted about a reported case.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific

details of the investigation or any disciplinary action taken as a result.

7. Non-Retaliation

Averda strictly prohibits any form of retaliatory action against individuals who raise concerns or ask questions, make reports, participate in investigations, refuse to participate in suspected improper or wrongful activity, or exercise any workplace rights that are protected by law. You must report immediately to the Ethics & Compliance Function if you believe you are being retaliated against. Examples of such behavior include, but are not limited to:

- unfair suspension
- unfair dismissal
- failing to hire or consider for hire or promotion
- adversely impacting working conditions or otherwise denying any employment benefit to an employee
- creating a hostile or intimidating work environment

Where retaliation is deemed to have taken place, disciplinary may be taken up to and including dismissal.

8. Responsibilities

8.1.1 Averda Employees & Directors

Averda employees, directors and anyone working on behalf of Averda are responsible for reading, understanding and following this Policy. Where you witness or become involved in misconduct you are required to escalate potential compliance concerns to your line manager or to the Ethics & Compliance Function. Where you submit a report or are contacted regarding an investigation or review, you are required to fully cooperate.

8.2 Averda Line Managers

When a line manager is informed of concerns by an employee that fall under the scope of this Policy, the line manager must report such concerns to the Ethics & Compliance Function.

8.3 Averda Leadership

Averda leadership are ultimately responsible for establishing and maintaining a sound internal control system that supports the achievement of Averda's policies, aims and objectives and a culture of transparency and raising concerns.

8.4 Ethics & Compliance Function

The Ethics & Compliance Function is responsible for the overall management and proposed changes to this Policy. The Policy should be reviewed at a minimum on an annual basis.