

**SPEAK-UP LINE POLICY**  
(updated November 2020)

**1. Introduction**

1.1 The Group is committed to conducting its business in a fair, honest and open manner whilst maintaining the highest possible ethical standards. Our commitment to uncompromising high ethical standards and compliance with all applicable laws governs our conduct in every part of the world where we operate or have dealings.

1.2 We expect all employees to maintain high standards in accordance with the Code and the Procedure. However, in the event something goes wrong, we have a duty to take appropriate measures to identify such situations and to promptly remedy them. By encouraging a culture of openness and accountability, we believe that we can help prevent such situations from occurring or address them when they do occur. If you have a concern, if you are not sure what is right in a particular circumstance, or if you think others might be breaking the rules, we encourage you to let us know.

1.3 The aims of this policy are to:

- a) encourage employees to report any ethics concerns or suspected or actual wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected to the extent legally permitted;
- b) provide employees with guidance as to how to raise such concerns; and
- c) reassure employees that they are able to raise genuine concerns in good faith without fear of retaliation, even if they turn out to be mistaken.

1.4 This policy may be amended at any time at the Company's discretion.

**2. Scope**

2.1 **Who is covered by this policy?** This policy applies to all employees, officers, consultants, contractors, and casual or agency workers.

2.2 Our Speak-Up Line is also available to our customers, suppliers, consumers or other third parties, who can report any concerns via the link on our corporate website (Corporate Responsibility section).

2.3 **What does this reporting policy cover?** This policy covers the reporting of information related to suspected or actual violations of the Code, Group policy or the law. This may include reports or concerns related to:

- (a) criminal activity
- (b) failure to comply with legal or regulatory obligations
- (c) miscarriages of justice

- (d) antitrust/competition law matters
- (e) environmental matters and workplace environment matters, including:
  - (i) respectful behaviour or discrimination and harassment; and
  - (ii) health and safety;
- (f) international business, including:
  - (i) international trade and export/import compliance; and
  - (ii) anti-bribery laws (including the UK Bribery Act);
- (g) public disclosures and trading in securities;
- (h) unethical business practices;
- (i) integrity and quality of products and technical information;
- (j) integrity of company records, including:
  - (i) accounting, internal controls and auditing matters; and
  - (ii) falsification of company records;
- (k) protection and proper use of assets, including theft or misuse of:
  - (i) confidential information or intellectual property; or
  - (ii) other company assets, including computers and information resources;  
other
- (l) malpractice;
- (m) other policy and compliance issues; and
- (n) the deliberate concealment of any of the above matters.

2.4 A **reporting person** is a person who in good faith raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities, or concerns related to suspected or actual violations of the Code, Group policy or the law (an "**ethics or compliance concern**") you should report it to the Group in accordance with the procedures described in this Policy and the Code.

2.5 If you are uncertain whether something is within the scope of this policy you should seek advice from the Group General Counsel.

### 3. **Raising an ethics or compliance concern**

3.1 We hope that in most cases you will be able to raise any concerns with your direct manager, who is your first resource when it comes to raising ethics concerns.

3.2 If you feel that your direct manager has not addressed your concern or you prefer not to raise it

with them for any reason, you should contact the Speak Up! Line on the following numbers:

|                        |                           |
|------------------------|---------------------------|
| Poland                 | <b>00 800 7233 2255</b>   |
| Czech Republic         | <b>00 800 72332255</b>    |
| Slovakia               | <b>0800 004 996</b>       |
| Italy                  | <b>00 800 7233 2255</b>   |
| Croatia                | <b>0 800 222 847</b>      |
| Germany                | <b>00 800 72332255</b>    |
| Bosnia and Herzegovina | <b>+44 191 516 7779 *</b> |
| UK                     | <b>0800 915 1571</b>      |

***\*Please select option 4 for Bosnia and wait for the interpreter. Note this is not a free phone number.***

Further country numbers can be found at the back of this document.

You can also contact the Speak-Up! Line online [www.safecall.co.uk/report](http://www.safecall.co.uk/report) and select your country.

Note that suspected or actual violations of the law or violations of our compliance obligations covered by the Code should be reported directly to the Group General Counsel. This includes, but is not limited to, issues related to Anti-Corruption and Anti-Bribery.

Note that due to data privacy considerations, most European employees can use the Speak-Up! Line only to report concerns and incidents relating to anti bribery, auditing and accounting, banking or financial matters.

The Speak-Up! Line is operated by a third party (Safecall) located in the UK and is available to take your report confidentially 24 hours a day, 7 days a week. To facilitate our investigation and to enable us to contact you directly, you are encouraged to identify yourself when making your report. However, if you prefer, your report to the Speak-Up! Line can be made anonymously, to the extent legally permitted under local laws.

- 3.3 Where you have made a report using the Speak-Up! Line, we may request additional information to address and investigate your concern. You can also visit the Speak-Up! Line website at [www.safecall.co.uk/report](http://www.safecall.co.uk/report)
- 3.4 Please ensure that you only use the Speak-Up! Line to raise genuine ethics or compliance concerns in relation to incidence(s) that have happened or are highly likely to happen. You will be asked to confirm the factual basis for your concerns, including the supply of documents which evidence your concern.

#### **4. Confidentiality and anonymity**

- 4.1 We encourage employees to voice ethics and compliance concerns openly under this policy. We also encourage you to identify yourself when you make your reports. To the extent permitted by law and consistent with fair and uniform enforcement of the Code, the identity of someone reporting a violation or concern will only be disclosed to those who need to know in connection with any resulting investigation or the administration of the Group's legal and ethics compliance program. Everyone who receives information regarding your identity under this process is obligated to maintain confidentiality to the extent feasible.
- 4.2 Please note that if you do decide to raise a concern or make a report anonymously, it may be more difficult for us to perform our investigation effectively if we cannot directly contact you to obtain additional information.

#### **5. External disclosures**

- 5.1 This policy provides guidance on the Group's procedures for reporting concerns and investigating suspected or actual violations of the Code, Group policies or the law. We strongly encourage you to contact the Group General Counsel directly for advice before reporting a concern to anyone outside of the Group. Apart from very exceptional circumstances, such concerns should always be reported internally or through the Speak-Up Line, as the first step.
- 5.2 Ethics and compliance concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. As with all ethics and compliance concerns we encourage you to report your concerns to your direct manager or the Group General Counsel. We strongly encourage you to contact the Group General Counsel for advice before reporting a concern to the third party.

#### **6. Investigation and outcome**

- 6.1 All concerns raised are taken seriously and will be promptly reviewed and appropriately investigated.
- 6.2 You may be contacted during our review and investigation process and asked to provide additional information.
- 6.3 In some cases we may appoint an investigator or team of investigators including employees with relevant experience in investigations or specialised knowledge of the subject matter.
- 6.4 We will aim to keep you informed of the progress of any such investigation. However, sometimes the need for confidentiality may prevent us from giving you specific details of the status of an investigation, its outcome or actions taken as a result. You should treat any information about the investigation as confidential.
- 6.5 All ethics or compliance reports and all information resulting from our investigation, including any personal data about any individual, will be processed, kept secure and deleted or archived in accordance with applicable local law including all data protection requirements of local law.

## **7. If you are not satisfied**

If you are not satisfied with the way in which your concern has been handled, you can raise it with the Group General Counsel.

## **8. Protection and support for reporting persons**

- 8.1 We encourage openness and will support employees who in good faith raise genuine concerns under this policy.
- 8.2 It is unacceptable for anyone to file a report knowing it to be malicious or false and retaliation or retribution for honestly reporting a concern about illegal or unethical conduct is against the Group's ethical principles and will not be tolerated. Anyone involved in such conduct will be subject to disciplinary action.

## **9. Individuals implicated in ethics or compliance reports**

- 9.1 If you are implicated in an ethics or compliance report that the Group determines to have been made in good faith, you will be informed in due time that the report has been made and will be given the ability to provide additional or corrective information, unless there is a substantial risk that doing so may jeopardize the Group's ability to investigate the report.
- 9.2 The Group and its agents will take adequate technical and organizational measures to keep secure any personal data processed about you in the course of an investigation under the data protection requirements of local law.

## **10. Privacy notice**

In principle, the Speak-Up! Line can be used – to the extent permitted by law – without providing your personal data. You may, however, voluntarily disclose your personal data, in particular information about your identity, e.g. your first and last name, your country of residence, your telephone number or your email address. In such case, your personal data will be processed in accordance with the EU General Data Protection Regulation („GDPR“) and/or other applicable data privacy laws.

Stock Spirits Group PLC, address: Solar House - Mercury Park, Wooburn Green HP10 0HH Buckinghamshire, and its affiliate entities (“Stock” or “we”) are the controllers of personal data processed under this policy. We process your personal data in order to check the report you have made through the Speak-Up! Line and to investigate suspected compliance or legal violations.

Your personal data will be processed on the basis of your consent given when reporting via the Speak-Up! Line (Article 6(1)(a) of GDPR). Furthermore, we process your personal data insofar as this is necessary for the fulfilment of our legal obligations. This includes, in particular, reports of facts relevant to criminal law, competition law and labour law (Article 6(1)(c) of GDPR). Your personal data will also be processed if this is necessary to safeguard the legitimate interests of Stock or of a third party (Article 6(1)(f) of GDPR). We have a legitimate interest in the processing of personal data to prevent and detect violations within Stock, to verify the legality of internal processes and to protect our integrity. If you provide us with special categories of personal data (e.g. sensitive personal data), we will process these on the basis of your explicit consent

(Article 9(2)(a) of GDPR).

We transfer your personal data outside the European Economic Area, in particular to the United Kingdom. Such transfer always takes place in accordance with the applicable law. In the event that personal data are transferred to an entity located in a third country that does not ensure an adequate level of protection, we apply appropriate safeguards, including standard data protection clauses approved by the European Commission. You can obtain a copy of these safeguards by contacting us at the email address [GDPR@stockspirits.com](mailto:GDPR@stockspirits.com). Your data may be shared with, among others, Stock Spirits Group companies, which have their seat in the United Kingdom. Your personal data will also be processed by Safecall Limited, which operates the Speak-Up! Line and is located in the United Kingdom, and processes your data at the request and on behalf of Stock under a data processing agreement.

We store personal data only as long as it is necessary for the processing of your notice or we have a legitimate interest in the storage of your personal data. Specific information on storage of your personal data is provided below.

You have the right to request access to your personal data, request a copy of the personal data you have submitted, request that your data be rectified, request erasure of your personal data and request that the use of your personal data be restricted. Furthermore, you have the right to object, on grounds related to your particular situation, against the use of your personal data on the basis of our legitimate interests (pursuant to Article 21(1) of GDPR). You also have the right to withdraw your consent to the use of your personal data at any time. Such withdrawal is without prejudice to the lawfulness of the use of the data on the basis of your consent prior to withdrawal (pursuant to Article 7 of GDPR).

If you have any questions, comments or requests regarding the use of your personal data, wish to withdraw your consent or exercise your rights, you can contact us by sending an email to: [GDPR@stockspirits.com](mailto:GDPR@stockspirits.com). You also have the right to file a complaint with your national supervisory authority, in particular if you believe that your personal data is processed incorrectly. You may find the relevant national supervisory authority here:

EU: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

UK: <https://ico.org.uk/global/contact-us/>

## **11. Deletion and archiving of your information**

The results of our investigation, including any personal data relating to you, will be deleted or archived if needed and permitted by applicable law. Allegations against you that are found to be unsubstantiated will be deleted without delay and, in general, information will be deleted 2 months after the end of the investigation, except where the data needs to be archived in order to mitigate the risk of future liability or harm to the Group or for the purpose of any criminal or disciplinary procedures or as otherwise required by applicable law.

Further to the deletion and archiving procedures outlined in the above paragraph, if your assertions have been contested by the individuals identified in your report and if we could not prove them, they will be blocked, i.e. they can only be used or transferred under exceptional circumstances. In particular, this may be the case where this is indispensable for scientific purposes, for use as evidence or for other reasons in the overriding interest of the entity in charge or a third party.

## 12. Responsibility for this policy

The Group General Counsel has overall responsibility for this policy.

### European Numbers

Note that due to data privacy considerations, most European employees can use the Speak-Up! Line only to report concerns and incidents relating to anti bribery, auditing and accounting, banking or financial matters.

|                |  |
|----------------|--|
| Austria        | 00 800 72332255                                    |
| Belgium        | 00 800 72332255                                    |
| Bulgaria       | 00 800 72332255                                    |
| Bosnia         | +44 191 516 7779 (Select option 4. Not free phone) |
| Croatia        | 0 800 222 847                                      |
| Cyprus         | 00 800 7233 2255                                   |
| Czech Republic | 00 800 72332255                                    |
| Denmark        | 00 800 72332255                                    |
| Estonia        | 8000 044 514                                       |
| Finland        | 990 800 7233 2255 (Telia Sonera)                   |
| Finland        | 999 800 7233 2255 (Elisa)                          |
| France         | 00 800 72332255                                    |
| Germany        | 00 800 72332255                                    |
| Greece         | 00 800 4414 1966                                   |
| Hungary        | 00 800 7233 2255                                   |
| Iceland        | 00 800 7233 2255                                   |
| Ireland        | 1 800 812 740                                      |
| Israel         | 012 800 7233 2255 (Golden Lines)                   |
| Israel         | 013 800 7233 2255 (Barak)                          |
| Israel         | 014 800 7233 2255 (Bezeq)                          |
| Italy          | 00 800 7233 2255                                   |
| Kazakhstan     | 8800 3333 499                                      |
| Latvia         | 00 800 7233 2255                                   |
| Lithuania      | 00 800 7233 2255                                   |
| Luxembourg     | 00 800 7233 2255                                   |
| Malta          | 800 62130  |

|             |                   |
|-------------|-------------------|
| Monaco      | 800 94421         |
| Netherlands | 00 800 7233 2255  |
| Norway      | 00 800 7233 2255  |
| Poland      | 00 800 7233 2255  |
| Portugal    | 00 800 7233 2255  |
| Romania     | 0372 741 942      |
| Russia      | 810 800 7233 2255 |
| Serbia      | 0800 190 609      |
| Slovakia    | 0800 004 996      |
| Slovenia    | 0800 81096        |
| Spain       | 00 800 7233 2255  |
| Sweden      | 0850 252 122      |
| Switzerland | 00 800 7233 2255  |
| Turkey      | 00 800 4488 20729 |
| UK          | 0800 915 1571     |
| Ukraine     | 0800 502 436      |