

# Frequently Asked Questions – Speak Up

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**1. How can I raise concerns about potential violations our Shared Values, the law or regulations?**

First, consider whether you are comfortable giving feedback to the person involved. Minor issues are almost always best dealt with this way. If you believe that the situation can't be resolved by talking to the individual, you can speak to your manager or next higher manager instead. You could also talk to your HR Manager or the Ethics & Compliance Officer in your Group. They will listen to your concerns and take appropriate action. Alternatively, you can use Speak Up.

**2. Which channels can I use to Speak Up?**

If you wish to report a potential violation, you can create a Speak Up report by contacting the Speak Up hotline or via this website.

- **Call the Speak Up phone line**
  - Your call will be answered by an independent external operator from Expolink, the company who provides third party reporting by telephone or internet on behalf of SHV Holdings. The operator will listen to your concerns and may ask additional questions. In most cases, the Speak Up phone line will initially be answered in English. If you would like to report your concern in a different language, the operator will invite an interpreter to the call. You can find a list of country-specific hotline numbers on the Speak Up portal. The lines are toll-free and operated 24/7 throughout the year.
- **Use the Speak Up website**
  - Report your concern via this Speak Up website.

### 3. Who can use Speak Up?

Speak Up is available to anyone who wants to raise a concern about a potential violation of:

- SHV's corporate philosophy and Shared Values;
- applicable code of conduct;
- SHV, Group or business unit policies and guidelines;
- local, national and international laws, rules or regulations.

This includes employees, contractors, former employees, business partners, customers and representatives.

### 4. What can be reported?

You can file a report about any concern you have regarding potential violations our Shared Values, the law or regulations. Some examples are:

- Confidentiality issues
- Breach of company policy
- Bribery
- Anti-competition
- Conflict of interest
- Environmental
- Fraud
- Gifts and hospitality
- Harassment
- Health and safety
- HR Issues
- Intimidation
- Money laundering
- Unfair dismissal
- Substance abuse

We welcome all concerns raised in good faith, even if the report turns out to be unfounded. However, if we find an employee has deliberately falsified a report or has acted inconsistently with SHV's corporate philosophy and Shared Values, they will be subject to disciplinary action, including possibly terminating their employment.

In some countries privacy laws limit what you may report via the Speak Up phone line or the Speak Up reporting website. When reporting through the website or contacting the Speak Up phone line, you will be given a limited set of reporting options. If you would like to report an issue that is not available through the Speak Up phone line or the Speak Up reporting website, please talk to either your manager or Ethics & Compliance Officer.

### 5. What should not be reported through Speak Up?

Speak Up is not for concerns about the quality or performance of products and services. There are separate complaints and customer service procedures available for that. Speak Up is not for reporting incidents (this includes emergency incidents, safety incidents, medical incidents or travel incidents). Speak Up also isn't for disagreements with management decisions, unless, of course, you think the decision concerned is a potential violation of our Shared Values, the law or regulations.

### 6. Am I protected?

SHV has a strict policy of non-retaliation against reporting employees. Anyone raising a concern must be treated as if no report was filed. We will take no disciplinary measures or other steps against an employee raising a genuine concern, even if this concern later turns out to be unfounded, mistaken or misguided. We will not tolerate any violation of this principle and will treat this as a separate incident. If you believe you have faced retaliation of any kind, please report it directly to management, the SHV Corporate Ethics & Compliance Director through [ethicsandcompliance@shv.nl](mailto:ethicsandcompliance@shv.nl) or through Speak Up.

## 7. Should I identify myself?

You're always encouraged to give your name and contact details when making a report. This makes the investigative process easier. If you're uncomfortable identifying yourself, you can report your concern anonymously, to the extent allowed by local laws. Sometimes, anonymous reports are harder to investigate, for instance if we do not have enough information or if we are unable to verify your report with you or develop an investigation plan.

## 8. What happens after I make a report?

When you have used Speak Up, your concern will be sent to SHV. SHV will carefully assess your Concern and pass it on to the right person to deal with it – and certainly NOT to someone who may be part of the problem. If an investigation is needed, you might be contacted for further information or additional questions, so please log into [shvspeakup.com](https://shvspeakup.com) or call the hotline regularly using the case ID you will be given when you make your report. Once the investigation is finished, you will be informed of the outcome. All reports will be treated in confidence, as far as we possibly can. Confidentiality is considered at every stage and SHV is committed to restrict sharing of the information to those people who have a need-to-know. Investigations are focused on facts and aim to establish whether the allegations are correct and whether our Shared Values, the law or regulations have been violated. The investigations are conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles.

## 9. How can I monitor progress of the investigation related to my report?

After you complete your Speak Up report by phone or online, you will receive a unique code called a Case ID. You will also be asked to create a password. You can use this Case ID and password to return to the Speak Up hotline or website at any point to check the status of your report or provide additional information.

## 10. Why has SHV contracted Expolink?

SHV contracted Expolink, to make it possible for our employees, representatives and interested third parties to report potential violations of our Shared Values, the law or regulations via an independent, professional third-party. This procedure can be used if employees do not feel comfortable giving feedback on the issue to the person involved or reporting to (line) management, HR Business Partner or Compliance Officer.

Expolink is an international operating company that provides secure, confidential telephone and web-based systems for those who wish to report a concern regarding a breach of business conduct. The Speak Up hotline and reporting website of Expolink are available 24 hours a day, seven days a week and provides interpretation services for telephone and web reporting in different languages.

## 11. What is Expolink's role?

The responsibilities of Expolink are:

- Provide telephone and web-based options through which people can report potential violations of our Shared Values, the law or regulations
- Protect the identity of reporters who wish to remain anonymous
- Provide interpretation services for reporters wishing to report in a different language than English
- Inform SHV Ethics & Compliance department about an existing concern, so that SHV can start an investigation
- Allow SHV Ethics & Compliance department to communicate with a reporter, who wishes to remain anonymous, by acting as an intermediary

It is not Expolink's role to take action to address the concern; only to transmit the concern to the SHV Ethics & Compliance department for handling.

## 12. How does Expolink protect confidentiality?

Expolink does not trace phone calls or use caller identification. In addition, Expolink does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking you to Expolink will be available. Speak Up reports from your computer would

come through a secure Internet port and do not trace or show user screen names. Expolink will not use information for any purpose other than providing it to SHV for appropriate handling.

### **13. What information should I provide?**

When submitting your report, try to include dates, times, people and places as appropriate. Tell us the business unit and location which the report relates to and provide as much information as possible.

### **14. What happens to my report?**

Your report will be processed independently by a member of the Expolink team, and securely transferred to the authorised recipient/s within your organisation. They will act on your report without compromising any individual. You will receive an initial response within maximum ten business days to let you know that your concern is being looked into. You may be asked for further information.

Who will take care of my report within my organisation?

Your organisation will investigate your concerns with whoever they feel is the most appropriate person. This might be someone within the organisation, or an independent person or agency outside the company. The case will be handled at least one management level up from where the issue reportedly exists.