




JAB

# Speaking Up – Whistleblower Policy

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December 2022

## **SPEAKING UP - WHISTLEBLOWER POLICY**

JAB is committed to conduct business with integrity and in an ethical manner. Ethical and Integrity standards are at the center of everything we do at JAB. Our Code of Conduct is about doing the right thing, in the right way, always. If you become aware of any suspected or actual violation of the Code of Conduct, laws, or any JAB policies, you have the responsibility to speak up. JAB will not retaliate against any person who raises in good faith an ethics or compliance issue through proper channels. Employees who raise concerns or who help us resolve reported matters are protected against retaliation.

### **TO WHOM IS THE SPEAKING UP - WHISTLEBLOWER POLICY AVAILABLE?**

The Speaking Up - Whistleblower Policy is available to all employees and external stakeholders (*i.e.*, suppliers, service providers and other third parties) who are encouraged to use the whistleblower reporting system to report any potential or actual breach of the Code of Conduct, laws or any JAB policies. External stakeholders should follow the same whistleblower process as JAB employees, as set out below. In general, complaints involving portfolio companies can be submitted through their respective channels. If for any reason this is not possible, issues can be raised through JAB's whistleblower system. Moreover, JAB actively communicates the Speaking Up - Whistleblower Policy to its Employees.

### **CONFIDENTIALITY AND POSSIBILITY TO SUBMIT ANONYMOUSLY**

Issues may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.. An investigation will not be disclosed or discussed other than with individuals who have a legitimate need to know. We reserve the right to use our discretion in disclosing any information obtained during an investigation to any third party, including regulatory bodies or government agencies.

**You have the possibility to submit your complaints anonymously.** However, we do encourage you to disclose your identity in order to facilitate an adequate investigation.

### **PROTECTION AGAINST RETALIATION**

Employees who raise concerns or who help us resolve reported matters are protected against retaliation. We will not tolerate retaliation in any form against any person for reports made in good faith. Any retaliation or attempt to deter or obstruct an employee from providing such information or participating in an investigation is prohibited and will be treated as a serious disciplinary offense. Anyone who uses the ethics and compliance program to spread falsehoods, threaten others, discourage others from making a report, or damage another's reputation will be subject to disciplinary action.

## WHERE TO REPORT

Any concern can be reported through the Whistleblower System, available to JAB employees and JAB external stakeholders at <https://www.jabholco.com/whistleblower>

To assist us in investigating, you are encouraged to provide all the information which you are comfortable disclosing.

## OPERATING GUIDELINES FOR REPORTING, INCIDENT INVESTIGATION AND CORRECTIVE ACTIONS

- 1.1 JAB has adopted this Speaking Up - Whistleblower Policy for reporting suspicious transactions and investigation and reporting of non-compliance behavior (such as the Code of Conduct, laws or any JAB policies), as well as consulting on business ethics matters.
- 1.2 As laid out in the Code of Conduct, JAB requires employees and relevant third parties to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and relevant third parties are responsible to report in good faith any and all actual or potential violations of laws, regulations, JAB Code of Conduct and any JAB policies, including and especially concerns regarding accountability for or auditing irregularities, fraud and corruption, confidentially and anonymously.
- 1.3 Employees and third parties can forward a complaint through the Whistleblower mechanism. The Whistleblower system is operated by the external party WhistleB, which provides a 24 hour, toll-free service, for Employees and external stakeholders to report violations, improper conduct, or any other situation that potentially generates question about its adherence to JAB's high standards of ethical behavior.
- 1.4 The General Counsel will notify the person (if known) who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. Depending on the nature of the irregularity, other responsible parties are informed by the General Counsel. The General Counsel is responsible for ensuring that all complaints about unethical or illegal conduct are sufficiently and appropriately investigated and resolved. The General Counsel will advise the Managing Partners of all complaints and its resolution.
- 1.5 All reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All reports about unethical or illegal conduct will be promptly investigated and may include an external investigation by hiring an external party in order to conduct the process in a timely way and avoiding potential conflicts of interest. Appropriate corrective action will be taken if deemed necessary by the investigation.
- 1.6 You are expected to participate in an investigation when asked. Investigations are conducted

regardless of a potential wrongdoer's length of service, position/title, or relationship to the Company. If you are not satisfied with our actions taken in response, you may report the matters to the Managing Partners.

- 1.7 Depending on the nature of the violation or breach of the Code of Conduct, the General Counsel will provide recommendations on remediation and corrective actions to the Managing Partners to the extent necessary, on a case-by-case basis.
- 1.8 The Speaking Up - Whistleblower policy is available in English, which is JAB's business language. JAB shall provide a translation of the Speaking Up - Whistleblower policy in local languages upon request of the Employee.
- 1.9 JAB shall disclose the number of reports received, types of misconduct and measures taken in its periodic reporting to the Managing Partners.