

SPEAKING UP

If you see something, say something.
Protect yourself, your colleagues and our Company.

What does speaking up mean?

What can you speak up about?

When to speak up?

How to speak up?

What to expect when you speak up?

What's expected of you when it comes to speak up?





SPEAKING UP



As a Company, we expect everyone to act responsibly and with integrity. But sometimes this may not be the case. If you hear or see something that might go against our Values or this Code, we encourage you to speak up. This enables us to deal with your concern and helps protect our people, Company and workplace. We will listen, act and protect.

Always. Everywhere.

Speaking up is a shared responsibility. The goal is to protect our people and Company from any form of harm by raising concerns before they become a problem. Or to prevent problems from becoming an even bigger issue. It can take courage to speak up, but it's the right thing to do.

What does speaking up mean?

Speaking up essentially means raising your concern so it can be addressed. Ideally, everyone should feel comfortable discussing concerns directly with the person involved. But we all know this is not always possible or realistic, which is why we offer various other ways for you to speak up.

What can you speak up about?

You're encouraged to speak up about activities or behaviours that are not in line with our Code or the law. For example: discrimination or harassment of a colleague, concerns about offences such as fraud and corruption, a conflict of interest or harm to the environment.

If you feel uneasy or uncomfortable about potential misconduct, raise your concern regardless of the scale or impact. There is never any harm in flagging something, however small it might feel. The risk lies in ignoring things. What may seem like a small issue initially could become much bigger if it's not brought to someone's attention and dealt with. Problems tend to grow and become worse over time. That said, our Speak Up program is not intended to settle personal or legal disputes, or for any grievances you may have about your employment - such as objections to your performance review, disagreements with your manager or complaints about a salary increase. Your People Business Partner is there to support you with any such issues or you can reach out to a Trusted Representative for advice or support.



When to speak up?

If you've experienced or noticed something suspicious or wrong, or if you feel uneasy about something that could violate our Code, you're encouraged to raise it at the earliest opportunity. Don't worry about how much information you have at this point. By raising a concern early, we have the best chance of finding a speedy resolution and stopping a situation from escalating. If you highlight your concern, we have processes in place to review and investigate it. If your concerns turn out to be mistaken or unfounded, you will never be blamed (except if you deliberately file a false report). After all, we'd rather review a concern that turns out to be unfounded than risk being left unaware about an issue that turns into a significant problem.

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HOW TO SPEAK UP?

There are multiple ways and channels to speak up.
It doesn't matter which one you choose, so speak up in
whichever way you feel most comfortable.



Global Business Conduct


You can also report your concern directly to Global Business Conduct via speakup@heineken.com.



Speak Up portal

You can also safely and securely raise your concern via our external, independent Speak Up portal. It's accessible 24/7 in your own language by web (speakup.heineken.com), phone or app.

You can speak up confidentially, and even anonymously, if you prefer.

A large QR code is positioned in the bottom right corner of the slide, set against a dark blue background. The QR code is white and appears to be a standard square matrix code.

We encourage all employees to use our dedicated channels to report concerns and issues internally. Where available and appropriate, however, reports can also be raised to official authorities.



Your manager

We encourage people to have honest conversations within their team, as issues are often best resolved straight away among colleagues. If you're uncomfortable discussing your concerns directly with the person involved, you can also speak to your manager. They're usually in a good position to understand and respond.



A trusted colleague

Alternatively, there are multiple people outside your department who you can speak to. Your local colleagues from the People, Legal/Compliance or P&CI teams are there to listen and advise, and so are the Trusted Representatives. You can seek advice from them informally about what to do, but they can also support you in filing a Speak Up report or file a report on your behalf.



WHAT TO EXPECT WHEN YOU SPEAK UP?

What happens next?

All Speak Up reports that are filed directly in our global Speak Up portal are reviewed by an independent team, to protect the confidentiality of the person filing the report and to ensure adequate follow-up and investigation. The purpose of an investigation is to gather facts in order to determine whether the concern is substantiated, and if so, what actions need to be taken. All employees are expected to fully cooperate in investigations. The Speak Up Guide contains more information about how cases are investigated. When reporting a concern, you'll receive an acknowledgement of receipt within five days. You'll also be notified once the investigation is complete. Details of the outcome will typically not be shared in order to protect the confidentiality of the investigation and respect the privacy of the people involved. If the concern is substantiated, a decision will be taken regarding what, if any, disciplinary action is needed. Other measures include process and control improvements as well as training to prevent future issues.

We protect confidentiality and anonymity

If you report a concern, information you provide will be shared only with people who need to know in order to investigate your concern or resolve the issue. However you choose to report it, your identity will not be revealed unless you agree. If you wish to remain anonymous, this will be respected. As a Company, we have a responsibility to investigate concerns, not the person who reported them. It is never acceptable for the identity of those who raise concerns anonymously to be traced or even guessed at. If you think your identity has been revealed without your permission, please report it.

Remember!

Don't remain silent because others are not acting. Protect your workplace, your colleagues and yourself by speaking up.

We have zero tolerance for retaliation

We truly value everyone who speaks up when they see something wrong involving our Company or people. We strictly prohibit any form of retaliation against anyone who speaks up in good faith or cooperates in an investigation. Retaliation is a violation of the Code and will lead to disciplinary action. If you believe you've suffered any form of retaliation, please report it so we can take action to protect you.

Don't misuse Speak Up to make false accusations

As much as we encourage you to speak up, you should never use the Speak Up channels to knowingly make false accusations against others – for example, if you're frustrated with colleagues or work tasks. This is unfair and damaging towards those involved, and will not be tolerated.



This could happen...

During team meetings, a manager often makes offensive and sexual comments to colleagues. Everyone knows but nothing seems to be done about it.

You might think...

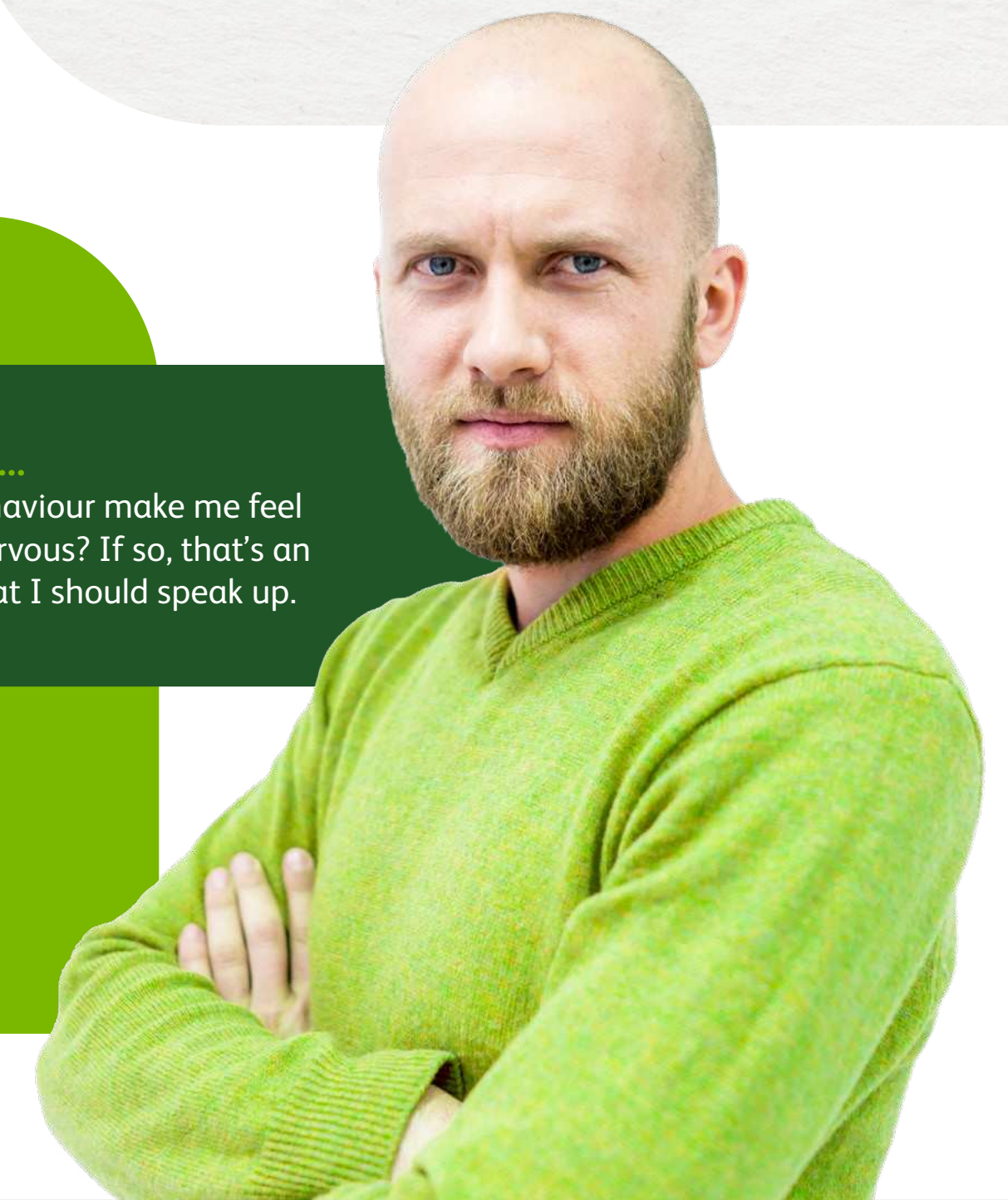
It's pointless to raise my concern. Nothing will happen or change anyway. If other people know about this issue but ignore it, maybe I'm overreacting and should just accept this is part of the team dynamics.

But in fact...

You should not ignore it but speak up. The fact that others are ignoring or seem to be accepting improper behaviour, should not stop you from reporting it. Raising a concern may feel difficult, but doing so can put an end to harmful situations or prevent them from becoming even worse. By speaking up, you are acting to protect yourself, your colleagues and your workplace. It can take courage to speak up, but it's the right thing to do.

Ask yourself...

Does this behaviour make me feel worried or nervous? If so, that's an indication that I should speak up.





WHAT'S EXPECTED OF YOU WHEN IT COMES TO SPEAK UP?

As an employee you have a responsibility to:

- **Know how and when to speak up.** Living by the Code is a team effort, and we count on your support to raise concerns and report breaches so we can address them. Please make sure you understand how to speak up, and do so when needed. If you suspect or discover any illegal activity in relation to our operations or activities involving third parties, immediately report it to your Legal team or directly via the Speak Up portal.
- **Never retaliate against someone for speaking up.** Continue treating anyone who speaks up with fairness and respect, and do not try to harm, punish or exclude them. Retaliation in any form (whether explicit or subtle) is wrong and will not be tolerated.
- **Cooperate in investigations.** As an employee, you're expected to cooperate and participate in Speak Up investigations. Subject to local laws, that means you should comply with any requests or instructions by the investigation team. This includes attending interviews, providing documentation, and complying with any other investigative measures and requests. Cooperation is key to ensuring the quality and fairness of the investigation. Don't obstruct or impede an investigation – for example, by deleting or destroying evidence or making false statements.
- **Respect confidentiality and privacy.** Don't discuss any issues under investigation with other people (including your colleagues and manager) unless it's been cleared with the investigation team. Confidentiality is needed to protect the integrity of the process, and ensures fairness for all parties involved.



If you're a people manager or senior leader, you have additional responsibilities:

- **Create a safe culture to speak up.** Encourage your team to raise concerns and report actual or suspected breaches of the Code. Make sure your team understands how to speak up and feels comfortable and safe to do so. Never tell or instruct anyone not to report their concern.
- **Offer support and protection.** Do not dismiss or ignore any concerns shared with you. Provide a listening ear and support anyone who raises concerns or brings actual or potential violations to your attention. Make sure they're respected and not retaliated against – by yourself or your colleagues.
- **Take adequate action.** Make sure any concerns raised are taken seriously and addressed promptly and properly. Depending on their nature, some concerns or issues may be resolved straight away among the team. If this isn't possible, escalate the concern as soon as possible – for example, by filing a Speak Up report. Once filed, the Speak Up Review Team can determine the appropriate course of action. Filing a Speak Up report is mandatory for matters that require investigation and for any fraud or regulatory issues (bribery and corruption, competition law, sanctions or money laundering). Fully and promptly cooperate and complete any documentation required by the investigation team (e.g. case information and lessons learnt).
- **Prevent future issues.** If a violation of the Code has occurred within your team or operations, ask yourself whether additional communication, training or changes to business processes and controls are needed to reduce the likelihood of similar breaches occurring in the future. And take action accordingly.

THIRSTY FOR MORE?

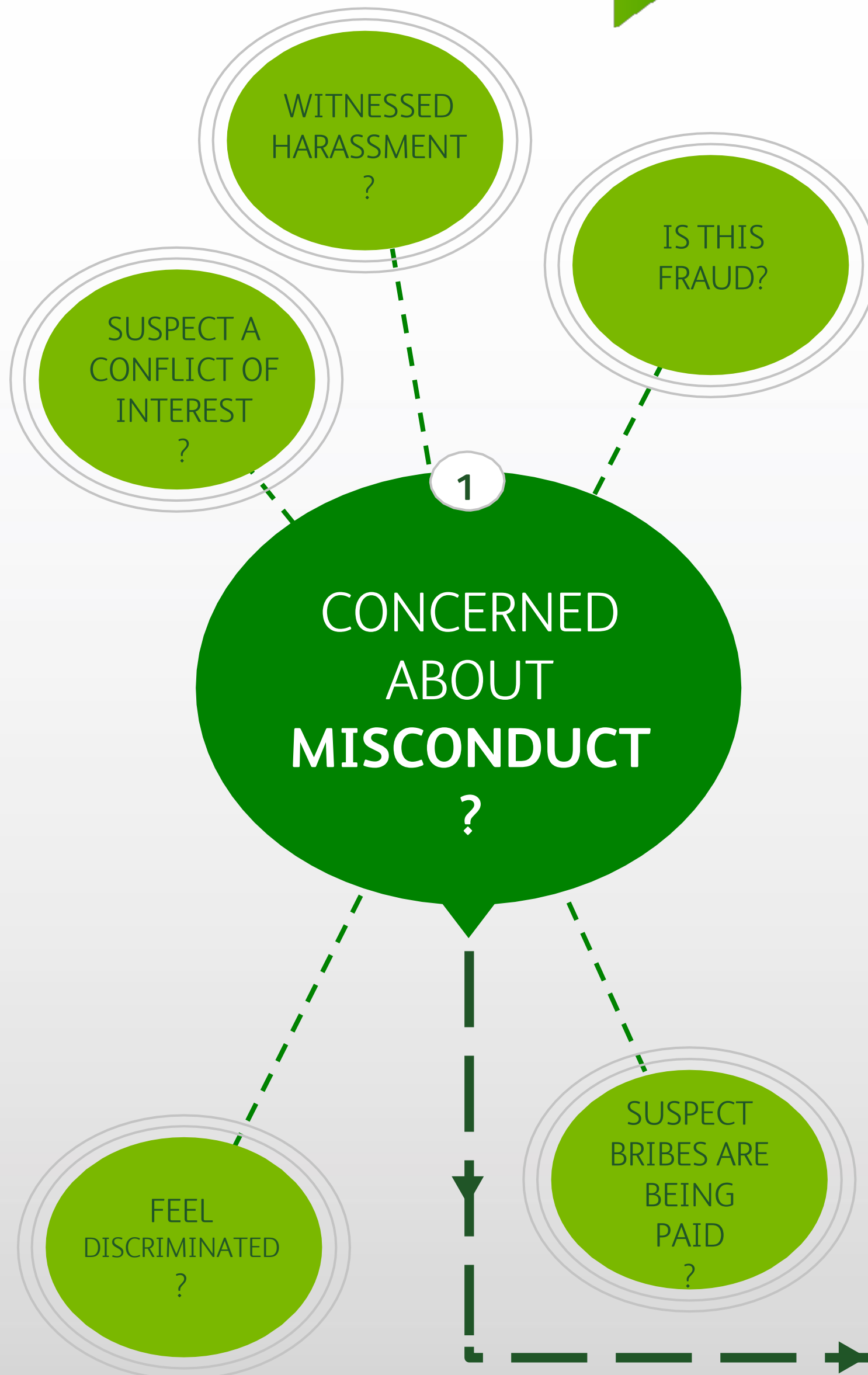
Have a look at our [Speak Up Guide](#) if you want to learn more, for example if you consider whether or not to speak up. The Speak Up Guide aims to demystify the process of speaking up and guides you through every step of the process.

Have questions?

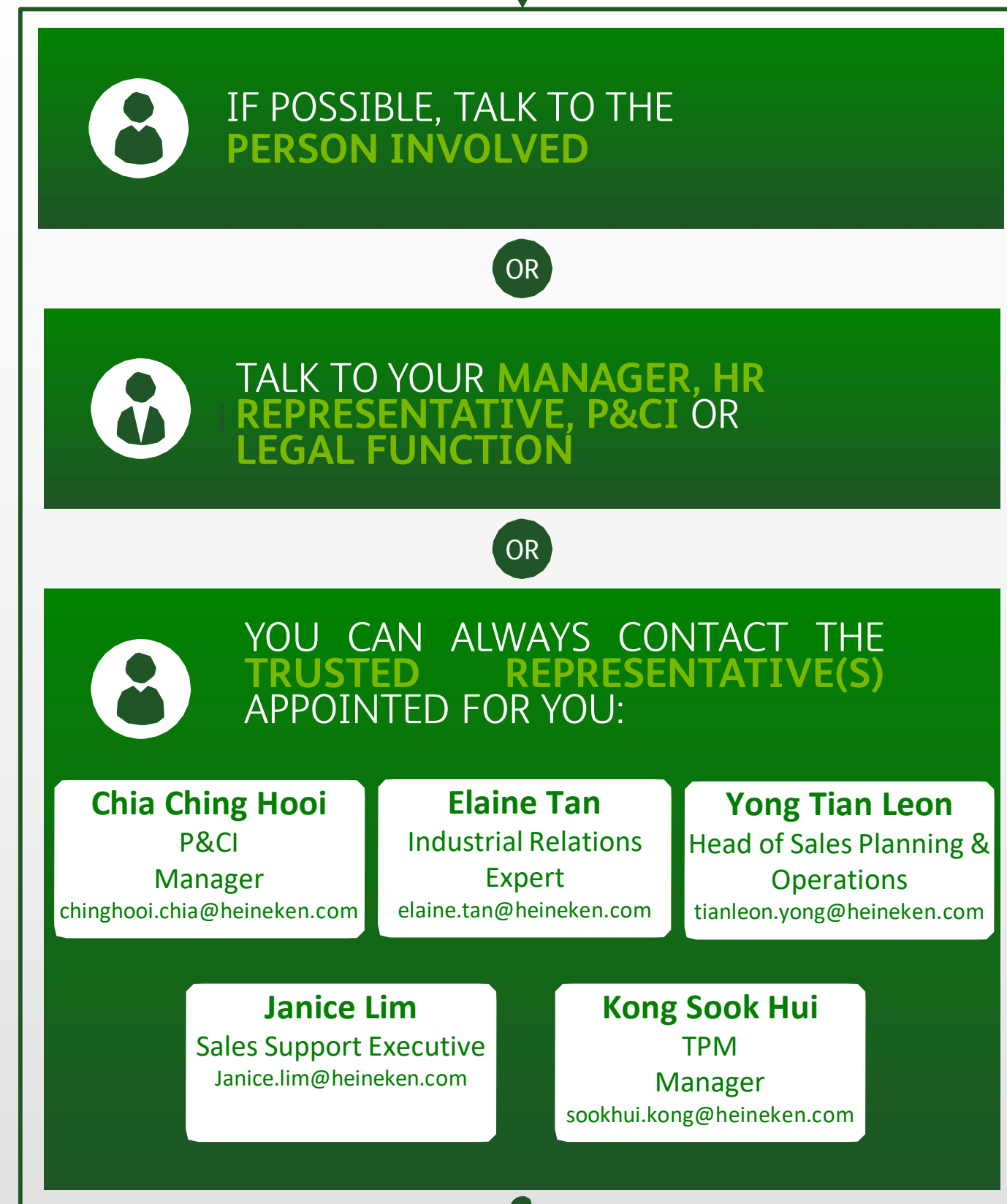
Just ask! Reach out to one of our Company's Trusted Representatives or contact Global Business Conduct.



SPEAK **UP**



2 WHO CAN I TALK TO?



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YOU CAN ALSO USE ONE OF THE FOLLOWING OPTIONS:



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WE UNDERSTAND IT IS NOT ALWAYS EASY TO RAISE CONCERNS ABOUT POSSIBLE MISCONDUCT BUT WE DO **ENCOURAGE YOU TO COME FORWARD WITH ANY CONCERNS AND SPEAK UP!**

ANY CONCERN WILL BE DEALT WITH **APPROPRIATELY AND CONFIDENTIALLY.**

