

# Speak Up Policy

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## 1. Why this Policy?

We are committed to conducting our business with honesty and integrity. We care for each other, our partners, customers and suppliers, society and our environment. We promote an open culture of trust and communication where violations of local laws, regulations and our policies, including the Code of Conduct, are not tolerated.

Reporting your concerns and violations, even if you only suspect them, is essential for us to live up to that commitment, maintain our reputation, ability to operate and make JET a better place to work and a better corporate citizen. We want you to feel encouraged and supported to Speak Up when something isn't right. Speaking Up makes a difference!

## 2. Who can Speak Up?

In this Policy, the words "JET", "we", "our", and "us" refer to Just Eat Takeaway.com N.V. and all its subsidiaries and affiliates across the world.

Whether you're an employee, an independent contractor, a supplier, a partner, a shareholder, a customer, or a relative of any of the above, you can use this Policy to Speak Up.

### 3. What do we mean by “Speaking Up”?

You’ll be “Speaking Up” if you tell us about any (possible) violation, even suspected, of laws, regulations, our Code of Conduct or any other wrongdoing related to JET. A non-exclusive list of examples:

- Bribery
- Fraud
- High risk attitudes to someone’s health and safety
- Sexual harassment
- Discrimination
- Bullying
- Misuse of substances
- Conflicts of interest
- Risk or actual damage to the environment
- Modern slavery
- Market abuse
- Someone covering up wrongdoing

Do not use this Policy:

- If someone’s life or safety is in danger. If you need emergency assistance, please contact your local emergency services.
- If you’re an employee, and you have a grievance related to your terms of employment, please contact your local Employee Relations representative.
- To settle personal or legal disputes.
- To make accusations which you know are false. If you act in bad faith this may have consequences for you as it is considered a Code of Conduct violation.
- If you had an issue with your order (e.g. your food was cold or not delivered).

### 4. How can you Speak Up?

Method	Channel
In-person	<p>If you work at JET, you can always contact your line manager or HRBP directly to report a concern.</p> <p>If they don’t address your concerns, are part of the concern you want to raise, or otherwise you don’t feel comfortable involving them, you can reach out to any member of the Ethics &amp; Compliance team directly.</p>
Email	<p>You can always email the Ethics &amp; Compliance team to report your concern or in case you have any questions. Drop them a line at <a href="mailto:compliance.global@justeattakeaway.com">compliance.global@justeattakeaway.com</a></p>
Speak Up hotline	<p>You can use our Speak Up hotline (externally referred to as Ethics hotline) to raise your concerns online or by phone. The Speak Up hotline is a service operated by an external and independent organisation.</p> <p>You can find links to our Speak Up hotline website <a href="#">here</a>, on the Kitchen (our intranet) or on any of the platform websites for the countries in which we operate.</p>

	<p>You can also use our Speak Up hotline to report your concern by phone. <a href="#">Telephone numbers</a> are available for every country and can be reached 24/7, 365 days a year.</p> <p>The Speak Up hotline supports over 340 languages, so you can submit your report online or by telephone in whichever language you prefer. If you make a report via the Speak Up hotline, you can choose to give your name or to remain anonymous.</p>
External reporting	<p>We want to reassure you that Speaking Up internally is strongly encouraged, and this should always be your first step. In special circumstances you can directly go to a regulator, or if you've exhausted all internal procedures you might even want to report your concern externally. You are under no obligation to Speak Up internally first if you report something to a regulator, and you do not need to tell us if you have spoken up externally.</p> <p>We strongly recommend you seek independent and impartial advice from a trusted organisation or body before Speaking Up outside of JET. That way you can get the support you need to make an informed decision.</p> <p>If you decide to Speak Up externally, please check the annex of the Policy for the list of the relevant authorities.</p>

## 5. How will you be protected if you Speak Up?

By Speaking Up, you protect our company and your colleagues. So when you Speak Up, we protect you from retaliation.

Retaliation is any negative actions taken against an employee for reporting any wrongdoing, whether the allegations are substantiated or not. Retaliation can take many forms, including a demotion, reduced hours, decreased pay or job assignments, or being harassed or even threatened. Retaliation is luckily quite rare but, where it does happen, it's usually carried out by individuals who know about or are involved in an investigation.

Retaliation is prohibited by law and never tolerated at JET. If you experience something that doesn't seem right, or you are feeling concerned that you may be experiencing retaliation, please tell us as soon as you can. Don't wait to see if you can gather evidence or if the situation gets worse; just tell us if you have any suspicions or concerns, and we will help.

## 6. How will you be protected if you are investigated?

If you are alleged to be responsible for wrongdoing, you are the subject of an investigation. If you are the subject of an investigation, your employment rights and right to privacy will be carefully considered. If there's an investigation, you will be informed about the allegation (not about the reporter of the allegation) and will be provided the opportunity to comment on the allegations. If the investigation finds no evidence that justifies taking measures against you, you will be protected from any negative effects. The same protection applies for those who are subject of reports made in bad faith. If evidence of wrongdoing is found and measures are taken, you are protected from unintended negative effects that go beyond the objective of the measure taken.

## **7. Confidentiality and anonymity**

We handle reports confidentially and we will do as much as we can to ensure that your identity is protected, whether you're someone who's spoken up, a witness, or someone accused of wrongdoing. Confidentiality is always our top priority. This means that your information will only be shared with a limited number of people on a strict need to-know basis. Information will only be disclosed outside this group if we are required to do so by law or an important public interest is at stake. If you've named anyone when raising your concern, we will never inform them that you're the person who has named them. We are committed to protecting the privacy of everyone involved in an investigation. We will do everything to safeguard your personal data and will use it only for the purposes of conducting a fair investigation and to comply with legal requirements.

We require anyone who is part of an investigation to maintain confidentiality and not to share or discuss information in relation to any case with others outside of the Ethics & Compliance team.

While we understand there might be situations where you feel you have no choice but to remain anonymous, anonymous reports are harder for us to investigate and make it more difficult for us to adequately support you. Please be reassured that we will not tolerate retaliation of any kind against you where you have raised a concern to us.

Please raise your concern as soon as possible - don't hold off because you feel you need to gather evidence. If you have a reasonable suspicion that something's up, Speak Up!

## **8. What kind of information do you need to provide?**

When you Speak Up, it's really helpful if you can provide as much detail in your initial report as possible. This enables us to act quickly and make sure we can conduct our investigation effectively.

When making a report, it is required to provide at least:

- A detailed description of the (suspected) wrongdoing;
- The location in which the (suspected) wrongdoing occurred;
- The name of the person(s) involved in the (suspected) wrongdoing (if known);

General accusations without specific allegations are not sufficient to launch an investigation.

## **9. Who will investigate the issue?**

The Ethics & Compliance team reviews the report and assigns it to the right team or person to investigate. They usually review and assign a report less than 24 hours after receiving it.

- Your local HRBP or Employee Relations team will be responsible for investigating HR-related reports, such as (sexual) harassment, discrimination or bullying.
- The relevant logistics team will investigate reports made by or about couriers.
- Other reports, such as those relating to information security, fraud, or privacy concerns, are investigated by a member of the relevant team.

- The Ethics & Compliance team will conduct investigations into all high and critical severity level cases, regardless of topic.
- If any member of the Legal & Compliance team, Company Secretary & General Counsel or Takeaway.com Payments B.V. Management Board, Supervisory Board and team members are the subject of an allegation, they will not be involved in conducting the investigation. If this happens, the report in question will be referred to the VP Internal Audit, who will appoint a case investigator.
- If you are based in Italy, your report will also be reviewed by the Italian supervisory body.
- An investigator may decide, after consultation with the Company Secretary & General Counsel (or the VP Internal Audit for reports related to the Legal & Compliance team), to involve external investigators. External investigators must be part of a professional body, such as lawyers, auditors, or accountants. They can either play a supporting role as a co-investigator, expert advisor or interview attendee or, if appropriate, may take on the investigation as the lead investigator.

## **10. What happens next?**

We will acknowledge receipt within seven days of raising your concern. If you reported a concern anonymously via the Speak Up hotline, you can check the Speak Up hotline website or call them via one of the numbers referenced above to receive progress reports and to support the investigation.

When an investigation has concluded, if an investigator finds that remedial measures are required, they will make recommendations to that effect. A decision whether any follow-up actions are required will be taken by our appropriate level of management. If we have found evidence of wrongdoing, the follow-up might include amongst others (i) disciplinary action in line with JET's Disciplinary Policy, (ii) passing details onto law enforcement, and/or (iii) changes to our policies and procedures to prevent similar issues from arising again in the future.

If a violation of law or external regulations is confirmed, we may be required to report or notify the violation to relevant (local) enforcement authorities, such as police or regulatory authorities, in order to comply with the relevant law or regulation. We also have the right to start a separate legal action against the person(s) or party in question.

We will reach out to you with the overall results of the investigation. For privacy reasons, no specifics can be shared with you concerning actions taken against the person(s) involved. We aim to follow up in a timely manner and to share the overall results within three months after receiving your report.

## **11. What is expected from you?**

Speaking Up is a shared responsibility. We expect that you report any (suspected) wrongdoing, so we can investigate and stop the wrongdoing, enable continuous improvement and foster a respectful workplace. The purpose of the investigation is to gather evidence and facts about the concern raised. To enable effective fact finding, as a JET employee you are required to cooperate in investigations. This includes making yourself available to meet with investigators, providing truthful and relevant information, and answering pertinent and reasonable questions during an investigation. Your cooperation is key to ensuring the quality and fairness of the investigation. You should not obstruct or impede an investigation – for example, by deleting or destroying evidence or

making false statements. Failure to cooperate in an investigation, or deliberately providing false information during an investigation, can be the basis for disciplinary action.

## 12. Where to go for advice?

There are a few places you can go if you're not sure about whether to flag something or who to go to. If you want to talk to someone at JET, try your line manager, a member of the HRBP, Employee Relations team, or the Ethics & Compliance team.

## 13. We investigated, but you're not happy. What can you do about it?

If you aren't satisfied with the investigation, please contact the VP Internal Audit within a month after receiving the outcome of the investigation. Internal Audit will review the investigation. to evaluate if due process was applied and the Speak Up Policy and the Speak Up Investigations Procedure were duly followed by the investigator(s). If they conclude that due process was not adhered to, they can decide to open an appeal case and appoint an appeal investigator.

## 14. What does Speaking Up mean for personal data?

We comply with applicable data protection and privacy rules related to the protection of personal data. Any personal data obtained through the Policy will be processed in accordance with privacy rules applicable to JET, as well as the JET Privacy Statement and Privacy Policy. Personal data will be processed solely for the purpose of completing the investigation process and in order to comply with our legal obligations. We retain personal data only as long as required after you Speak Up or to comply with applicable legal requirements. For more information about how we process personal data, read our Privacy Statement. If you have any questions, contact the Group Data Protection Officer or Director Compliance.

## 15. Reporting

The Ethics & Compliance team will submit a summarised and anonymized overview of all reports quarterly to the JET Audit Committee and annually to the Management Board, Supervisory Board and Works Councils.

## 16. Monitoring and review

This Policy is monitored by the Ethics & Compliance team. This Policy will be reviewed at least annually.

Version	Amended by...	Date	Approved by ExCo Member
2.0	Alice Drain	11/02/2021	Sophie Versteege
3.0	Anastasia Avramenko Vincent Koorstra	27/09/2022	Sophie Versteege
4.0	Anastasia Avramenko Vincent Koorstra	20/12/2023	Sophie Versteege
5.0	Anastasia Avramenko Vincent Koorstra	05/12/2024	Sophie Versteege

## Annex

### Whistleblowing Reporting Authorities

Country	Authorities
Australia	<ul style="list-style-type: none"> <li>• <a href="#">Australian Competition and Consumer Commission</a></li> <li>• <a href="#">Fair Work Ombudsman</a></li> <li>• Other prescribed Commonwealth authorities</li> </ul>
Austria	<ul style="list-style-type: none"> <li>• Bundesamt zur Korruptionsprävention und Korruptionsbekämpfung</li> <li>• Bundesministerium für Inneres Herrengasse 7 1010 Wien Österreich E-Mail: <a href="mailto:BMI-III-BAK-SPOC@bak.gv.at">BMI-III-BAK-SPOC@bak.gv.at</a> Telephone: + 43 1 53 126-906800 <a href="#">Website</a></li> <li>• Abschlussprüferaufsichtsbehörde (APAB): <a href="#">Whistleblower-Service</a></li> <li>• Bilanzbuchhaltungsbehörde: <a href="#">Das Hinweisgebersystem der Bilanzbuchhaltungsbehörde</a></li> <li>• Bundeswettbewerbsbehörde: <a href="#">Whistleblower werden</a></li> <li>• Finanzmarktaufsichtsbehörde: <a href="#">Einführung</a></li> <li>• Geldwäschemeldestelle: <a href="#">Meldestellen</a></li> <li>• <a href="#">Notariatskammern</a></li> <li>• Rechtsanwaltskammern: <a href="#">Österreichischer Rechtsanwaltskammertag</a></li> <li>• <a href="#">Kammer der Steuerberater und Wirtschaftsprüfer</a></li> </ul>
Belgium	<ul style="list-style-type: none"> <li>• Central reporting channel Federal Ombudsman Rue de Louvain 48 letter box 6 1000 Brussels Belgium Email: <a href="mailto:integrity@federalombudsman.be">integrity@federalombudsman.be</a> Phone: +32 (0)2 289 27 04 <a href="#">Website</a></li> </ul>
Bulgaria	<ul style="list-style-type: none"> <li>• Central reporting channel Commission for Personal Data Protection 2 Prof. Tsvetan Lazarov Blvd., Sofia, 1592</li> </ul>



	<p>Email: <a href="mailto:kzld@cpdp.bg">kzld@cpdp.bg</a>  <a href="#">Website</a></p>
Canada	<p>There is no central reporting channel. Instead, it is possible to report wrongdoing through the local regulatory bodies.</p>
Denmark	<ul style="list-style-type: none"> <li>• <b>Datatilsynet Whistleblowerordningen</b>  Carl Jacobsens Vej 35  2500 Valby  Telephone: +45 33 19 32 02  E-Mail: <a href="mailto:wb@datatilsynet.dk">wb@datatilsynet.dk</a>  <a href="#">Website</a></li> <li>• <a href="#">Other external whistleblower schemes</a></li> </ul>
France	<ul style="list-style-type: none"> <li>• Central reporting channel  Défenseur des droits  Libre réponse 71120  75342 PARIS CEDEX 07  <a href="#">Website</a></li> </ul>
Germany	<ul style="list-style-type: none"> <li>• <b>Bundesamt für Justiz</b>  Adenauerallee 99 – 103  53113 Bonn  Deutschland  Telephone: +49 228 99 410-40  <a href="#">Website</a></li> <li>• <b>Hinweisgeberstelle</b>  Graurheindorfer Straße 108  53117 Bonn  Email: <a href="mailto:hinweisgeberstelle@bafin.de">hinweisgeberstelle@bafin.de</a>  <a href="#">Reporting system</a>  Telephone: +49 228 / 4108 – 2355  <a href="#">Website</a></li> <li>• <b>Bundeskartellamt <i>Responsible for reporting information on violations under § 2 paragraph 1 number 8. § 7 paragraph 1 sentence 2 HinSchG.</i></b>  Kaiser-Friedrich-Str. 16 53113 Bonn  <a href="#">Reporting system</a>  Telephone: +49 228 9499 386  <a href="#">Website</a></li> </ul>
Ireland	<ul style="list-style-type: none"> <li>• <b>Office of the Protected Disclosures Commissioner</b>  6 Earlsfort Terrace, Dublin 2, D02 W773  General enquiries - <a href="mailto:info@opdc.ie">info@opdc.ie</a>  To report a wrongdoing - <a href="mailto:disclosures@opdc.ie">disclosures@opdc.ie</a>  01 639 5650  <a href="#">Website</a></li> <li>• <b>The Minister for Public Expenditure and Reform signed the Protected Disclosures Act 2014 (Disclosure to Prescribed Persons) Order 2020 in September 2020.</b>  <a href="#">Website</a></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>The Central Bank of Ireland is a prescribed person for the purpose of receiving protected disclosures under the Protected Disclosures Act 2014 and under Part 5 of the Central Bank (Supervision and Enforcement) Act 2013.</b> <a href="#">Website</a></li> </ul>
Israel	No reporting mechanism has been established yet.
Italy	<ul style="list-style-type: none"> <li>• Central reporting channel Autorità Nazionale Anticorruzione (ANAC) - - Tutti i diritti riservati c/o Palazzo Sciarra, Via Minghetti, 10 00187 Roma C.F. 97584460584 Email: <a href="mailto:protocollo@pec.anticorruzione.it">protocollo@pec.anticorruzione.it</a> Tel.: +39 / 06 62289571 <a href="#">Website</a></li> </ul>
Luxembourg	No reporting mechanism has been established yet.
Netherlands	<p>Depending on the nature of the (suspected) misconduct and the report, it is possible to make a report through the websites / whistleblowing portals of the following authorities:</p> <ul style="list-style-type: none"> <li>• Autoriteit Consument en Markt;</li> <li>• Autoriteit Financiële Markten;</li> <li>• Autoriteit persoonsgegevens;</li> <li>• De Nederlandsche Bank N.V.;</li> <li>• Het Huis voor Klokkenluiders;</li> <li>• Inspectie gezondheidszorg en jeugd;</li> <li>• Nederlandse Zorgautoriteit;</li> <li>• Autoriteit Nucleaire Veiligheid en Stralingsbescherming.</li> <li>• <a href="#">Click here for more information</a></li> </ul>
Poland	No reporting mechanism has been established yet.
Slovakia	<ul style="list-style-type: none"> <li>• Central reporting channel Whistleblower Protection Office (appointed prior to national implementing laws coming into effect) Úrad na ochranu oznamovateľov Námestie slobody 29 811 06 Bratislava Tel.: +421 948 935 166 Email: <a href="mailto:sekretariat@oznamovatelia.sk">sekretariat@oznamovatelia.sk</a> <a href="#">Website</a></li> </ul>
Spain	<p><b>Central reporting channels:</b></p> <ul style="list-style-type: none"> <li>• <b>Inspección General de Servicios, Subdirección General de Información Administrativa e Inspección General de Servicios.</b> En el ámbito del resto del Ministerio excepto (CEJ y MUGEJU) C/ Bolsa nº 8, 28071 de Madrid o</li> </ul>

	<ul style="list-style-type: none"><li>• <b>Subdirección General de Auditoría Interna y de Gestión del Conocimiento de la Abogacía General del Estado.</b> En el ámbito Abogacía General del Estado C/ San Bernardo nº 45, 28015 de Madrid.</li><li>• Through the web: <a href="https://www.mjusticia.gob.es/es">https://www.mjusticia.gob.es/es</a></li><li>• Face to face meeting: Ask for an appointment calling from 9:00 to 14:00.</li></ul> <p><b>Inspección General de Servicios del Ministerio de Justicia (que excluye CEJ y MUGEJU):</b> 918377301. <b>Subdirección General de Auditoría Interna y de Gestión del Conocimiento de la Abogacía General del Estado:</b> 913904825.</p>
Switzerland	No reporting mechanism has been established yet.
United Kingdom	<ul style="list-style-type: none"><li>• Refer to the <a href="#">official government page</a></li></ul>